



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Publication of Class I Legal Ad for the WV Division of Air Quality**

1 message

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**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: Jeremy Basham <jbasham@bdtonline.com>, clantz@bdtonline.com  
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

Wed, Jun 8, 2022 at 9:42 AM

Please publish the information below as a Class I legal advertisement (one time only) in the Friday, June 10, 2022 issue of *The Register-Herald*. Please let me know that this has been received and will be published as requested. If we cannot publish on June 10 please advise me of the first available date prior to publication. Thank you.

Send the invoice for payment and affidavit of publication to:

**Stephanie Mink**

[Stephanie.R.Mink@wv.gov](mailto:Stephanie.R.Mink@wv.gov) \*\*

**WV Department of Environmental Protection**

**DIVISION OF AIR QUALITY**

**601- 57th Street**

**Charleston, WV 25304**

**\*\*To expedite payments for legal notices we are asking that all invoices and affidavits be emailed to the requestor. Any invoices which are mailed to the office are subject to delays due to limited staff being available to sort mail. Thank you for your assistance during this transition.\*\***

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**NOTICE OF COMMENT PERIOD FOR DRAFT/PROPOSED OPERATING PERMIT RENEWAL**

Title V of the Federal Clean Air Act and the state Air Pollution Control Act requires that all major sources and certain minor sources have a permit to operate which states all requirements (e.g. emission limitations, monitoring requirements, etc.) established by regulations promulgated under the aforementioned programs. The Division of Air Quality (DAQ) has determined that the draft/proposed permit renewal referenced herein meets this requirement.

The DAQ is providing notice to the general public of its preliminary determination to issue an operating permit renewal to the following company for operation of the referenced natural gas transmission facility:

Pinnacle Mining Company, LLC  
Pinnacle Preparation Plant  
Plant ID No.: 109-00006  
Pinnacle Creek Road  
Pineville, WV 24874

This notice solicits comments from the public and affected state(s) concerning the above preliminary determination and provides an opportunity for such parties to review the basis for the proposed approval and the

"draft" permit renewal. This notice also solicits comments from the U.S. EPA concerning the same preliminary determination and provides an opportunity for the U.S. EPA to concurrently review the basis for the proposed approval as a "proposed" permit.

All written comments submitted by the public and affected state(s) pursuant to this notice must be received by the DAQ within thirty (30) days of the date of publication of this notice. Under concurrent review, written comments submitted by the U.S. EPA must be received by the DAQ within forty-five (45) days from the date of publication of this notice or from the date the U.S. EPA receives this draft/proposed permit renewal, whichever is later. In the event the 30th/45th day is a Saturday, Sunday, or legal holiday, the comment period will be extended until 5:00 p.m. on the following regularly scheduled business day. The public shall have 135 days from the date of publication of this notice to file petitions for concurrently reviewed permits. Upon notice by the U.S. EPA to the DAQ, prior to the end of the 45 day notice period, the U.S. EPA may choose to hold the 30 day comment period on the draft permit and the 45 day comment period on the proposed permit sequentially. During the public comment period any interested person may submit written comments on the draft permit and, if no public hearing has been scheduled, may request a public hearing. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Director of the DAQ shall grant such a request for a hearing if she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located, after 30 day notice is given. The DAQ will consider all written comments prior to final action on the permit.

Copies of the Permit Application, DAQ Fact Sheet, and Draft/Proposed Permit Renewal may be downloaded from the DAQ's web site at: <https://dep.wv.gov/daq/permitting/titlevpermits/Pages/default.aspx>.

Comments and questions concerning this matter should be addressed to:

WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Contact: Dan Roberts  
(304) 926-0499 ext.: 41902





Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Fwd: Ad: 611591, NOTICE OF COMMENT PERIOD FOR DRAFT/P**

1 message

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**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

Wed, Jun 8, 2022 at 1:41 PM

Your notice has been confirmed for Friday. Please take a look at the proof and let me know if everything looks okay. If you can get the drafts to me and have your IPR file updated by around Noon tomorrow that would be great. I need a little time to get everything on the web and we have to get the email to EPA before the notice publishes.

Thanks  
Stephanie

----- Forwarded message -----

From: <clantz@bdtonline.com>  
Date: Wed, Jun 8, 2022 at 1:36 PM  
Subject: Ad: 611591, NOTICE OF COMMENT PERIOD FOR DRAFT/P  
To: <stephanie.r.mink@wv.gov>

Stephanie,  
Attached is a proof for a legal ad that is scheduled to be published in the Register Herald on 6/10/22. Let me know if there are any changes that needs to be made.  
Thank you,  
Christina Lantz  
Register Herald  
304-327-2899

**MINK-91-611591-1.pdf**  
43K

# BECKLEY NEWSPAPERS

801 North Kanawha Street, Beckley, WV 25801  
www.register-herald.com • Phone: 304-255-4400  
Toll Free: 800-950-0250 • Fax: 304-255-4427

## Ad Proof

This is the proof of your ad scheduled to run on the dates indicated below. Please proofread carefully and if changes are needed, contact us prior to deadline at  
or email at [clantz@bdtonline.com](mailto:clantz@bdtonline.com).

**DATE** 06/08/22

### Client:

WV DEP AIR QUALITY  
601 57TH SE ST  
CHARLESTON, WV 25304-0000  
(304) 926-3647

ACCOUNT NUMBER: 106453

*Ad ID:* 611591

*Sort Line:* NOTICE OF COMMENT PE

*Start:* 06/10/22

*Stop:* 06/10/22

*Total Cost:* \$92.45

*# of Lines:* 115

*Columns Wide:* 1

*# of Inserts:* 2

*Ad Class:* Legals

*Ad Taker:* Christina Lantz

*Phone #:*

*Email:* [clantz@bdtonline.com](mailto:clantz@bdtonline.com)

### Publications:

Register-Herald  
[register-herald.com](http://register-herald.com)

### NOTICE OF COMMENT PERIOD FOR DRAFT/PROPOSED OPERATING PERMIT RENEWAL

Title V of the Federal Clean Air Act and the state Air Pollution Control Act requires that all major sources and certain minor sources have a permit to operate which states all requirements (e.g. emission limitations, monitoring requirements, etc.) established by regulations promulgated under the aforementioned programs. The Division of Air Quality (DAQ) has determined that the draft/proposed permit renewal referenced herein meets this requirement.

The DAQ is providing notice to the general public of its preliminary determination to issue an operating permit renewal to the following company for operation of the referenced natural gas transmission facility:

Pinnacle Mining Company, LLC  
Pinnacle Preparation Plant  
Plant ID No.: 109-00006  
Pinnacle Creek Road  
Pineville, WV 24874

This notice solicits comments from the public and affected state(s) concerning the above preliminary determination and provides an opportunity for such parties to review the basis for the proposed approval and the "draft" permit renewal. This notice also solicits comments from the U.S. EPA concerning the same preliminary determination and provides an opportunity for the U.S. EPA to concurrently review the basis for the proposed approval as a "proposed" permit.

All written comments submitted by the public and affected state(s) pursuant to this notice must be received by the DAQ within thirty (30) days of the date of publication of this notice. Under concurrent review, written comments submitted by the U.S. EPA must be received by the DAQ within forty-five (45) days from the date of publication of this notice or from the date the U.S. EPA receives this draft/proposed permit renewal, whichever is later. In the event the 30th/45th day is a Saturday, Sunday, or legal holiday, the comment period will be extended until 5:00 p.m. on the following regularly scheduled business day. The public shall have 135 days from the date of publication of this notice to file petitions for concurrently reviewed permits. Upon notice by the U.S. EPA to the DAQ, prior to the end of the 45 day notice period, the U.S. EPA may choose to hold the 30 day comment period on the draft permit and the 45 day comment period on the proposed permit sequentially. During the public comment period any interested person may submit written comments on the draft permit and, if no public hearing has been scheduled, may request a public hearing. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Director of the DAQ shall grant such a request for a hearing if she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located, after 30 day notice is given. The DAQ will consider all written comments prior to final action on the permit.

Copies of the Permit Application, DAQ Fact Sheet, and Draft/Proposed Permit Renewal may be downloaded from the DAQ's web

site at: <https://dep.wv.gov/daq/permitting/titlevpermits/Pages/default.aspx>.

Comments and questions concerning this matter should be addressed to:

WV Department of  
Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Contact: Dan Roberts  
(304) 926-0499 ext.: 41902



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Re: Ad: 611591, NOTICE OF COMMENT PERIOD FOR DRAFT/P**

1 message

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**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: "Mink, Stephanie R" <stephanie.r.mink@wv.gov>

Wed, Jun 8, 2022 at 2:19 PM

Thanks for sending me the proof, because I found a mistake. At the end of the second paragraph, the description "natural gas transmission facility" should be changed to "coal preparation plant with a thermal dryer facility."

I have attached a revised ad with the correction already made. Do you want a working copy with the wrong description struck out in red and the new description underlined in blue? easiest for you and the newspaper?

Sorry,  
Dan

**notice of comment period.docx**  
20K

## NOTICE OF COMMENT PERIOD FOR DRAFT/PROPOSED OPERATING PERMIT RENEWAL

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601 57th Street SE  
Charleston, WV 25304  
Contact: Dan Roberts  
(304) 926-0499 ext.: 41902



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

**Re: Ad: 611591, NOTICE OF COMMENT PERIOD FOR DRAFT/P**

1 message

**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: clantz@bdtonline.com  
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

Wed, Jun 8, 2022 at 2:24 PM

Christina:

Thanks so much for sending this, the engineer caught a mistake that he made when we submitted it to you. It only involves the second paragraph but I am sending the entire ad as it should read. Can you please send an updated proof once the correction is made?

Thanks  
Stephanie

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Stephanie,  
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Thank you,  
Christina Lantz  
Register Herald  
304-327-2899



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022**

1 message

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**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: Stephanie R Mink <stephanie.r.mink@wv.gov>

Tue, Jun 7, 2022 at 2:03 PM

Stephanie,

Hey. Carrie has given me permission to go to notice on this renewal permit. I am still working through some formatting issues in the draft permit, so I am forwarding only the notice now.

The only certified newspaper in Wyoming County is the Pineville Independent Herald with a circulation of 312. I asked Carrie already and she said not to worry about publishing in a larger newspaper in an adjacent county unless we cannot get the ad published there. I called the contact number at 304-888-4534 and was told it is a weekly paper now published on Thursdays and that the deadline for submittal is on Wednesdays. The email address given to me was [team@independentherald.com](mailto:team@independentherald.com).

Respond or call me if you need anything else or have any questions.

Thanks!  
Dan

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**2 attachments** **notice of comment period.docx**  
20K **T5\_Info\_Table\_Renewal.doc**  
40K

## NOTICE OF COMMENT PERIOD FOR DRAFT/PROPOSED OPERATING PERMIT RENEWAL

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WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Contact: Dan Roberts  
(304) 926-0499 ext.: 41902



## Facility Information for Draft/Proposed/Final **RENEWAL** Permits

Engineer and E-Mail Address	Dan Roberts <a href="mailto:Daniel.p.roberts@wv.gov">Daniel.p.roberts@wv.gov</a>
Company Name	Pinnacle Mining Company, LLC
Facility Name	Pinnacle Preparation Plant
County	Wyoming
Permit No.	R30-10900006-2022
Newspaper	<i>The Independent Herald</i>
Responsible Official Title Street or P. O. Address City, State, Zip E-Mail Address	Bill Johnson Power of Attorney 302 South Jefferson Street Roanoke, VA 24011 <a href="mailto:Bill.johnson@bluestone-coal.com">Bill.johnson@bluestone-coal.com</a>
Environmental Contact Title Street or P. O. Address City, State, Zip E-Mail Address	Jason Little Environmental Manager 302 South Jefferson Street Roanoke, VA 24011 <a href="mailto:Jason.little@bluestone-coal.com">Jason.little@bluestone-coal.com</a>
Consultant's Name E-mail Address	Donna Toler <a href="mailto:Donna.toler@suddenlink.net">Donna.toler@suddenlink.net</a>
Affected States and/or Class I Area	KY, VA
Regional Office	N/A
Reg 13 Permit Nos. (if applicable)	R13-2183K

**Hard Copies** of the following to Stephanie:

<b>Draft/Proposed</b>	<b>Final</b>
Facility Information Table	
Notice	
Draft permit	Final Permit
Fact Sheet	Final Fact Sheet

**E-mail** to Stephanie and **create a folder** under *G:\Shared Drives\DEP AQ Permitting\AQ Permitting\TITLEV\Permits* for your permit and save the following files:

<b>Draft/Proposed</b>	<b>Final</b>
Notice	
Draft Permit	Final Permit
Fact Sheet	Fact Sheet
Reg 13 Permits (if applicable)	



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Re: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022**1 message

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**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: "Roberts, Daniel P" <daniel.p.roberts@wv.gov>  
Cc: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

Tue, Jun 7, 2022 at 2:52 PM

Thanks Dan. Should it ever come up The Welch News is owned by the same company and they are equally as difficult to work with. It's very rare to have anything in McDowell county but depending on the location within the county we tend to shift toward Raleigh or Mercer's newspapers.

On Tue, Jun 7, 2022 at 2:45 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:

Carrie had mentioned that there was one newspaper that you had trouble with, but couldn't remember if it was Pineville. I think that the Register Herald would be the safer and more reliable option... and would probably reach more people in the area than the Pineville paper.

I added Carrie to this email response to get her opinion.

Thanks again,  
Dan

On Tue, Jun 7, 2022 at 2:21 PM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

The last time we tried to deal with Pineville we never got a response out of them to confirm a publication date. That was one for R.A. and we all discussed it and opted for the Register-Herald out of Beckley. They cover six counties including Wyoming and they are far easier to deal with and they are still a daily so its more flexible. If you want to run that option by Carrie feel free to do so but Pineville is very unreliable. Just let me know which way to go.

On Tue, Jun 7, 2022 at 2:03 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:  
Stephanie,

Hey. Carrie has given me permission to go to notice on this renewal permit. I am still working through some formatting issues in the draft permit, so I am forwarding only the notice now.

The only certified newspaper in Wyoming County is the Pineville Independent Herald with a circulation of 312. I asked Carrie already and she said not to worry about publishing in a larger newspaper in an adjacent county unless we cannot get the ad published there. I called the contact number at 304-888-4534 and was told it is a weekly paper now published on Thursdays and that the deadline for submittal is on Wednesdays. The email address given to me was [team@independentherald.com](mailto:team@independentherald.com).

Respond or call me if you need anything else or have any questions.

Thanks!  
Dan



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

## Re: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal

1 message

**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Mon, Jun 6, 2022 at 11:04 AM

Thanks!

Dan

On Mon, Jun 6, 2022 at 11:02 AM McCumbers, Carrie <carrie.mccumbers@wv.gov> wrote:

I would just go ahead and have Stephanie set up the ad to be published on Thursday. She doesn't have to send everything out until Thursday, so that will give you a few extra days if they comment. Also, they can comment during the draft comment period.

I would just publish in one newspaper. The Pineville paper may be the newspaper that Stephanie has had difficulty contacting. If it is then I think she published an ad in the Beckley paper instead. Rule 30 just says to publish a Class I legal ad in a newspaper in general circulation for the county where the emission will occur.

On Mon, Jun 6, 2022 at 10:52 AM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:

Carrie,

Hey. I did not receive any response from the company or consultant. I just tried to call the consultant, but had to leave a voicemail message for Donna. Should I reach out to the company again or move forward with publication of the ad?

The only certified newspaper in Wyoming County is the Pineville Independent Herald with a circulation of 312. They have to have the ad and info by Wednesday for publication on Thursday. Being such a small newspaper, should the legal ad also be published in a bigger newspaper in an adjacent county closest to the facility?

Thanks,  
Dan

----- Forwarded message -----

From: **Roberts, Daniel P** <daniel.p.roberts@wv.gov>

Date: Tue, May 24, 2022 at 5:57 PM

Subject: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal

To: <bill.johnson@bluestone-coal.com>

Cc: <jason.little@bluestone-coal.com>, Donna Toler <donna.toler@suddenlink.net>, McCumbers, Carrie <Carrie.McCumbers@wv.gov>

Mr. Johnson,

I am emailing the draft permit and fact sheet that I created for the Pinnacle Mining Company, LLC renewal application. I already sent it to Carrie McCumbers, my supervisor and incorporated her comments. I do still need to work on the emission units table and create a header row and remove some line breaks, which may change the page numbers and table of contents references.

Please respond and let me know whether you have any comments or suggestions by next Friday June 3, 2022. In the meantime, I will continue preparing everything else required to go to notice on this draft permit.

Sincerely,

Dan Roberts

WV Department of Environmental Protection

Division of Air Quality

Title V Permitting Section

(304) 926-0499 ext. 41902

[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal**

1 message

**Roberts, Daniel P** <daniel.p.roberts@wv.gov>

Tue, May 24, 2022 at 5:57 PM

To: bill.johnson@bluestone-coal.com

Cc: jason.little@bluestone-coal.com, Donna Toler &lt;donna.toler@suddenlink.net&gt;, "McCumbers, Carrie" &lt;Carrie.McCumbers@wv.gov&gt;

Mr. Johnson,

I am emailing the draft permit and fact sheet that I created for the Pinnacle Mining Company, LLC renewal application. I already sent it to Carrie McCumbers, my supervisor and incorporated her comments. I do still need to work on the emission units table and create a header row and remove some line breaks, which may change the page numbers and table of contents references.

Please respond and let me know whether you have any comments or suggestions by next Friday June 3, 2022. In the meantime, I will continue preparing everything else required to go to notice on this draft permit.

Sincerely,

Dan Roberts

WV Department of Environmental Protection

Division of Air Quality

Title V Permitting Section

(304) 926-0499 ext. 41902

[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)

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**2 attachments****R30-10900006-2022 Draft Fact Sheet 5-24-22.doc**  
107K**R30-10900006-2022 Draft Permit 5-24-22.docx**  
324K

**West Virginia Department of Environmental Protection**

*Harold D. Ward  
Cabinet Secretary*

# Permit to Operate



Pursuant to  
**Title V**  
of the Clean Air Act

*Issued to:*  
**Pinnacle Mining Company, LLC**  
**Pinnacle Preparation Plant**  
**R30-10900006-2022**

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Laura M. Crowder  
Director, Division of Air Quality

*Issued: [Date of issuance] • Effective: [Equals issue date plus two weeks]  
Expiration: [5 years after issuance date] • Renewal Application Due: [6 months prior  
to expiration]*

Permit Number: **R30-10900006-2022**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **~~P.O. Box 338, Pineville, West Virginia 24874~~**  
**302 South Jefferson Street, Roanoke, VA 24011**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

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Facility Location:	Pineville, Wyoming County, West Virginia
Mailing Address:	<del>P.O. Box 338, Pineville, West Virginia 24874</del> <u>302 South Jefferson Street, Roanoke, VA 24011</u>
Telephone Number:	<del>304-732-9720</del> <u>540-314-0115</u>
Type of Business Entity:	LLC
Facility Description:	The facility is a coal preparation plant which processes raw coal from an <del>associated</del> underground bituminous coal mine plus other raw coal sources. The preparation <u>process</u> involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, <del>and</del> low sulfur coal <u>product</u> . Operations at the plant include breaking, crushing, handling, screening, washing and drying.
SIC Codes:	1222
UTM Coordinates:	456.10 km Easting \$ 4,155.40 km Northing \$ Zone 17

Permit Writer: Daniel P. Roberts

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

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**ATTACHMENT B – Monthly Delivery Rate Report from Outside Suppliers**

**ATTACHMENT C – Monthly Transfer Rate Report**

**ATTACHMENT D – Monthly Refuse Storage (ST-12) Report**

**Certification of Data Accuracy**



## 1.0 Emission Units and Active R13, R14, and R19 Permits

### 1.1 Emission Units

Equipment ID Number	Design Capacity	Year Installed / Modified <sup>(2)</sup>	Description	Method of Control <sup>(1)</sup>	Associated Transfer Points/Equipment		
					Location: B - Before A - After	ID. No.	Method of Control <sup>(1)</sup>
Storage Addition							
OS-1	631,000 Tons	I – 1998 M- 1999 M-2000,2001, 2002	Open Stockpile OS-1 - Receives coal via dump truck. A front-endloader is used to move coal from the Open Stockpile OS-1 to trucks for hauling to Stockpiles ST-2, ST-11, ST-13, ST-14, ST-16, or Storage Pit ST-10.	N	B	T65	MD
					A	T92	N
Rotary Breakers (C11-1 & C11-2) Circuit							
ST-14	54,000 Tons	I - 2001 M-2002	Raw Coal Open Stockpile ST-14 - Receives coal by truck from Stockpile OS-1 and off site suppliers and transfers it via front-endloader to Dump Hopper DH-3 and/or front endloader to truck.	N	B  A	T93  T94 T104	MC  PE MC
DH-3	45 Tons	I – 2001	Dump Hopper DH-3 - Receives coal via truck and/or front-endloader from Raw Coal Open Stockpile ST-14 and transfers it to Conveyor C10-3.	PE	B  A	T94  T95	PE  PE
C10-3	1,000 TPH	I – 2001	Conveyor C10-3 - Receives coal from Dump Hopper DH-3 and transfers it to Mine Car Dump MCD-1.	PE	B  A	T95  T96	PE  FE
MCD-1	40 Tons	I – 2001	Mine Car Dump MCD-1 - Receives coal from Conveyor C10-3 and transfers it to Conveyors C11 - 1 and/or C11-2 via feeders in the bottom of MCD-1.	PE	B A	T96 T72A, T72B	PE FE FE
C11-1	1,000 TPH	I – 1970	Conveyor C11-1 - Receives coal from Mine Car Dump MCD-1, Conveyor S3A and Conveyor C11-4, and transfers it to Rotary Breaker 13-1.	PE	B  A	T72A T73 T75 T111	FE PE PE PE
C11-2	1,000 TPH	I – 1970	Conveyor C11-2 - Receives coal from Mine Car Dump MCD-1, Conveyor C11-4, and Conveyor S3A and transfers it to Rotary Breaker 13-2.	PE	B  A	T72B T74 T76 T112	FE PE PE PE
C11-4	800 TPH	I -1979	Conveyor C11-4 - Receives coal from the Storage Pit ST-10 and transfers it to Belt Conveyor C11-1 and/or Belt Conveyor C11-2.	PE	B A	T4-9 T73 T74	PE PE PE
Rotary Breaker 13-1 (13-1E)	1,000 TPH	I – 1970	Rotary Breaker 13-1 - Receives coal from Conveyor C11-1. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T75  T8-1 T9-1A	PE  PE PE
Rotary Breaker 13-2 (13-2E)	1,000 TPH	I - 1970	Rotary Breaker 13-2 - Receives coal from Conveyor C11-2. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T76  T8-2 T9-1B	PE  PE PE
8A	Continued Under Refuse Circuit						
C24	Continued Under Raw Coal Handling System						

<b>Raw Coal Handling System</b>							
S10	4000 TPH	I - 1986 M – 1998 M – 2006	Conveyor S10 - Receives coal from No. 50 Mine and transfers it to Scalping Screen SS-1.  Equipped with SS-1 bypass chute to divert coal directly to ST-11	PE	B  A	-----  T50 T120	-----  FE N
S3A	2,500 TPH	I-1986 M-2002	Conveyor S3A – Receives coal from Scalping screen SS-1 and transfers it to Belt Conveyor C11-1 and/or C11-2.	PE	B A	T110 T111 T112	FE PE PE
SS-1	4000 TPH	I – 1998	Scalping Screen SS-1 - Receives coal from Conveyor S10. Oversized coal is routed to the Shawnee Rotary Breaker S6. Undersized coal goes to a two-way flop gate which can transfer coal to Conveyor RCT-1 or Conveyor S3B.	FE	B  A	T50  T54 T51 T53 T110	FE  FE FE FE
S6	1500 TPH	I-1986	Shawnee Rotary Breaker S6 - Receives coal from Scalping Screen SS-1. Refuse is transferred to Conveyor S7. Coal exiting the Rotary Breaker is transferred to Conveyor S5.	FE	B  A	T54  T28-3, T27-5	FE  PE PE
S7	Continued under Refuse Circuit						
RCT-1	4000 TPH	I – 1998	Conveyor RCT-1 – Receives coal from Scalping Screen SS-1 and transfers it to Conveyor S5.	FE	B A	T51 T52	FE FE
S5	4000 TPH	I - 1986 M – 1998	Conveyor S5 – Receives coal from Conveyor RCT-1 and Rotary Breaker S6, and transfers it to a Stack Tube/Stockpile ST-11. Note that Conveyor S5 was lengthened and its design capacity increased to 4,000 TPH.	PE	B  A	T52 T27-5  T49	FE PE  MD
ST-11	1,106,000 Tons	I - 1986 M-1998, 2001 M-2006	Stack Tube/Stockpile ST-11 - Receives coal from Conveyor S5, truck, and SS-1 bypass chute and transfers via underground feeder to Conveyor S3 and/or via front endloader to truck.	N	B  A	T49 T120 T103 T32 T102	MD N N FE N
S3	2,500 TPH	I - 1986	Conveyor S3 – Receives coal from underground feeder located beneath Stack Tube/Stockpile ST-11 and transfers it to Conveyor S3B.	PE	B  A	T32  T33	FE  PE
S3B	4,000 TPH	I - 1986 M – 1998	Conveyor S3B - Receives coal from Conveyor S3 and Scalping Screen SS-1 two-way flop gate, and routes it to 60" Raw Coal Belt Conveyor C24. Design capacity increased to 4,000 TPH.	PE	B  A	T33 T53  T34	PE FE  PE
C24	4,000 TPH	I - 1970 M- 1994	Conveyor C24 - Receives coal from Conveyor S3B and Rotary Breakers 13-1 and 13-2 and transfers it to Raw Coal Storage Silo A ST-3, Conveyor C31, or Conveyor C31-A.	FE	B  A	T34, T8-1, T8-2 T10-3, T10-2, T10-1	PE PE PE FE FE PE
<b>Raw Coal to Storage and to Preparation Plant</b>							
ST-3	6,000 Tons	I - 1970	6,000 Ton Raw Coal Storage Silo A ST-3 - Receives coal from Conveyor C24 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B  A	T10-3  T12-1	FE  FE
C31	4,000 TPH	I - 1970 M- 1994	Conveyor C31 - Receives coal from Conveyor C24 and transfers it to Raw Coal Storage Silo ST-4.	FE	B  A	T10-2  T10-4	FE  FE

ST-4	6,000 Tons	I - 1970	Raw Coal Storage Silo B ST-4 - Receives coal from Conveyor C31 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B A	T10-4 T12-2	FE FE
C31-A	4,000 TPH	I - 1981	Conveyor C31-A - Receives coal from Conveyor C24 and transfers coal to Stack Tube/Raw Coal Storage Stockpile ST-2.	PE	B A	T10-1 T11	PE MC
ST-2	77,000 Tons	I - 1981 M- 2001	Raw Coal Storage Stockpile ST-2 - Receives coal from Conveyor C31-A and truck dump and transfers it via front-endloader to Feeder C36, Storage Pit ST-10, trucks, and/or railcar.	N	B A	T11 T101 T100, T77 T113	MD MD MD MD, PE MD
C36	500 TPH	I - 1981	Feeder C36 - Receives coal from Raw Coal Storage Stockpile ST-2 and transfers it to the 48" Raw Coal Belt Conveyor C37.	PE	B A	T77 T12-3	PE FE
C37	1,500 TPH	I - 1970	48" Raw Coal Belt Conveyor C37 - Receives coal from the 48" Reciprocating Feeders from Raw Coal Storage Silos A and B (ST-3 and ST-4) and Feeder C36, and transfers it to Conveyor C45.	FE	B A	T12-1, T12-2, T12-3 T13	FE FE FE FE
C45	1,500 TPH	I - 1970	Conveyor C45 - Receives coal from Conveyor C37 and transfers it into the preparation plant.	PE	B A	T13 -----	FE -----
<b>Refuse Circuit</b>							
8A	400 TPH	I - 1992	Conveyor 8A - Receives refuse from Rotary Breakers 13-1 and 13-2. Refuse is transferred to Conveyor C8.	N	B A	T9-1a T9-1b T46-2	PE PE FE
C8	Continued below under C8						
S7	800 TPH	I - 1986	Conveyor S7 - Receives refuse from the Rotary Breaker S6 and transfers it to the 80 ton Rock Bin.	PE	B A	T28-3 T29	PE PE
Rock Bin	80 Ton	I - 1970	Rock Bin - Receives refuse from Conveyor S7 and transfers it to a 72" Reciprocating Feeder.	FE	B A	T29 -----	PE -----
Rock Crusher #6	280 TPH	I - 1970	Rock Crusher #6 - Receives refuse from Rock Bin and transfers it to 36" Rock Belt Conveyor C8.	FE	B A	T34-2a T35	FE FE
C8	400 TPH	I - 1970	36" Rock Belt Conveyor C8 - Receives refuse from Rock Bin #6, Rock Crusher #6, and Conveyor 8A. Transfers refuse to the 400 ton Refuse Bin ST-7.	PE	B A	T34-2b, T35, T46-2 T36	FE FE FE FE
C125	463 TPH	I - 1970	36" Plant Refuse Belt Conveyor C125 - Transfers refuse from the Preparation Plant's Washing Circuit to the 400 ton Refuse Bin ST-7.	PE	B A	----- T37	----- FE
ST-7	400 Ton	I - 1970	400 Ton Refuse Bin ST-7 - Receives coal refuse from 36" Rock Belt Conveyor C8 and 36" Plant Refuse Belt Conveyor C125 and transfers it to feeder 127 and then to Refuse Belt Conveyor C128-1 or the Emergency Refuse Stockpile.	FE	B A	T36 T37 -----	FE FE -----
C128-1	400 TPH	I - 1970	Conveyor - Receives refuse from Refuse Bin ST-7 and transfers it to Point "A" Storage Bin ST-8.	PE	B A	T38 T39	FE FE
ST-8	85 Tons	I - 1970	Point "A" Storage Bin ST-8 - Receives refuse from Conveyor C128-1 and transfers it to Belt Conveyor C128-2.	FE	B A	T39 -----	FE -----
C128-2	400 TPH	I - 1970	Conveyor C128-2 - Receives refuse from Storage Bin ST-8 and transfers it to Conveyor C128-3.	PE	B A	T40 T41	PE PE
C128-3	400 TPH	I - 1983	Conveyor C128-3 - Receives refuse from Conveyor C128-2 and transfers it to Conveyor C128-4.	N	B A	T41 T42	PE PE
C128-4	400 TPH	I - 1983	Conveyor C128-4 - Receives refuse from Conveyor C128-3 and transfers it to Conveyor C128-5.	N	B A	T42 T43	PE PE

C128-5	400 TPH	I – 2001	Conveyor C128-5 - Receives refuse from Conveyor C128-4 and transfers it to Conveyor C128-6.	N	B A	T43 T44	PE PE
C128-6	400 TPH	I-2006	Conveyor C128-6 - Receives refuse from Conveyor C128-5 and transfers it to Stacking Belt Conveyor.	PE	B A	T44 T121	PE PE
Stacking Belt Conveyor	400 TPH	I - 1970	Stacking Belt Conveyor - Receives refuse from Conveyor C128-6 and transfers it to the Refuse Stockpile ST-12.	PE	B A	T121 T45	PE MC
ST-12	26,000 Tons	I - 1970	Refuse Stockpile ST-12 – Receives refuse from Stacking Belt Conveyor and dozers move to permanent storage.	N	B A	T45 -----	MC -----
Rotary Breakers (13-1 & 13-2) Bypass							
Raw Coal Auger Sampler	N/A	I – 1998	Raw Coal Auger Sampler - Samples coal from dump trucks at the truck scales. Emissions are expected to be minimal.	N	B A	----- -----	----- -----
ST-10	50 Tons	I – 1979 M – 2001	Raw Coal Storage Pit ST-10 - Receives coal from dump trucks and front-endloader and transfers it to Conveyor C11-4.	PE	B A	T4-8 T105 T4-9	MC MC PE
C11-4 Continued Under Rotary Breakers ( 13-1 & 13-2 ) Circuit							
RC-1 Continued under Clean Coal Circuit							
Clean Coal Circuit							
TD1	800 TPH	I - 1970 M- 1996	McNally Fluidized bed Thermal Dryer with two cyclones and two venturi scrubbers.	CY,SC, ME	B A	----- 001-2 A,B	----- CY,SC, ME
C100	800 TPH	I - 1970	42" Dryer Feed Belt Conveyor C100 - Transfers wet coal from Preparation to Thermal Dryer, which dries it and transfers to Horizontal Axis Mixer No. 120.	PE	B A	----- T15	----- PE
C118	800 TPH	I - 1970 M-1995	54" Coarse Clean Coal Belt Conveyor - Receives coarse clean coal from inside Preparation Plant and transfers it to Horizontal Axis Mixer No. 120.	PE	B A	T48 T16	PE FE, SC
Horizontal Axis Mixer No. 120	320 TPH	I - 1970	Horizontal Axis Mixer No. 120. Receives coarse clean coal from Conveyor C118 and clean coal from Thermal Dryer, and transfers coal to 72" Clean Coal Transfer Belt Conveyor C119.	FE	B A	T16 T17	FE, SC FE, SC
C119	1,000 TPH	I - 1970	72" Clean Coal Transfer Belt Conveyor C119 - Receives coal from the Horizontal Axis Mixer No. 120 and transfers coal to 48" Clean Coal Belt Conveyor C132.	FE	B A	T17 T18	FE, SC FE, SC
C132	1,000 TPH	I - 1970	48" Clean Coal Belt Conveyor C132 - Receives coal from the 72" Clean Coal Transfer Belt Conveyor C119 and transfers it to the 10,000 Ton Clean Storage Silo ST-5 and/or Conveyor SC-1.	FE	B A	T18 T19, T19A	FE, SC FE FE
ST-5	10,000 Ton	I – 1970	Storage 4 - 10,000 Ton Clean Coal Storage Silo ST-5. Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfers it through one mass flow feeder and six 48" reciprocating feeders to a 72" Collecting Belt Conveyor C139.	FE	B A	T19 T20	FE FE, SC
C139	5,000 TPH	I - 1970 M - 1998	72" Collecting Belt Conveyor C139 - Receives coal from Storage 4 (ST-5) through one mass flow feeder and six 48" reciprocating feeders. Transfers coal to the 72" Belt Conveyor to Sampling Tower C141. Design capacity increased to 5,000 TPH.	FE	B A	T20 T21	FE, SC FE

C141	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor C141 - Receives coal from 72" Collecting Belt Conveyor C139 and Conveyor RC-1, and transfers it to the 72" Belt Conveyor C152. Design capacity increased to 5,000 TPH. A small portion of coal from Conveyor C141 is transferred to and from the Clean Coal Sampler System.	FE	B  A	T21, T23  T24	FE FE  FE
Clean Coal Sampler System (F01 & F02)	N/A	I - 1970 M - 1998	Clean Coal Sampler System - Receives coal from 72" Belt Conveyor C141 via Primary Sample Belt Conveyor and transfers it to the Primary Sample Crusher and the Nuclear Analyzer and subsequently back to conveyor C141.	FE	B  A	-----  -----	-----  -----
C152	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor to Loading Bin C152 - Receives coal from 72" Belt Conveyor C141 and transfers it to the 200 Ton Loading Bin ST-6. Design capacity increased to 5,000 TPH.	FE	B  A	T24  T25	FE  FE
ST-6	200 Ton	I - 1970 M - 2001 M - 2004	200 Ton Loading Bin ST-6 - Receives coal from the 72" Belt Conveyor C152 and transfer it to railroad cars.	FE	B  A	T25  T26	FE  FE, DSS
SC-1	1,000 TPH	I - 1991	Belt Conveyor SC-1 - Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfer it to the Stack Tube/Clean Coal Storage Stockpile ST-13.	PE	B  A	T19A  T19B	FE  MC
ST-13	514,000 Tons	I - 1991 M - 1998 M - 2002	Stack Tube/Clean Coal Storage Stockpile ST-13 - Receives clean coal from Conveyor SC-1 and transfers it using six vibrating feeders to Belt Conveyor RC-1 and/or via front end loader to trucks. Up to 360,000 TPY combined may be trucked to and from ST-13.	N	B  A	T19B T114  T22 T115	MC N  FE N
RC-1	4,000 TPH	I - 1991 M - 1998	Belt Conveyor RC-1 - Receives coal from six vibrating feeders located underneath the Clean Coal Storage Stockpile ST-13 and also from Belt Conveyor C141, and transfers it to the 72" Belt	PE	B  A	T22  T81 T23	FE PE FE
<b>Trucked Coal and Coal Fines Circuit</b>							
ST-16 (ST-16E)		I - 2002 A - 2008	Coal & Pond Fines Open Stockpile ST-16 - Receives coal and pond fines by truck and transfers it via front-end loader to Dump Hopper DHRC-4; via underground feeders to conveyor C120; and/or via front-end loader to truck.	N	B  A	T122 T134 T124 T135 T126	N N PE MD FE
DHRC-4 (DHRC-4E)		N	Dump Hopper DHRC-4 - Receives coal and/or pond fines by front-end loader and transfers it to Conveyor C120.	PE	B  A	T124  T125	MD  MD
C120 (C120E)	1,150 TPH	I - 2002 A - 2008	Conveyor C120 - Receives coal and/or pond fines from Stockpile ST-16's underground feeders and/or Dump Hopper DHRC-4 and transfers it to Conveyor C121 or Conveyor RC-5.	PE	B  A	T125 T126 T127A T127B	MD FE PE PE
C121 (C121E)	5 TPH	I - 2002 A - 2008	Conveyor C121 - Receives coal and/or pond fines from Conveyor C120 and transfers it to Conveyor C122 and Sample Collector.	PE	B  A	T127A  T128	PE  PE
C122 (C122E)	5 TPH	I - 2002 A - 2008	Conveyor C122 - Receives coal and/or pond fines from Conveyor C121 and transfers it to Conveyor RC5.	PE	B  A	T129  T130	PE  PE
RC-5 (RC-5E)	4000 TPH	I - 1998 M - 1999 M - 2001	Belt Conveyor RC-5 - Receives coal and/or coal fines from Conveyor C120 and C122 and transfers to Conveyor RC-1 (see Clean Coal Circuit).	N	B  A	T125 T127B T130 T81	PE PE PE PE
<b>Roadways</b>							
PRP	N/A	I - 1970 M - 2001	Paved Roadways and parking lots.	RWMW	N/A	N/A	N/A

URP	N/A	I - 1970 M- 2001	Unpaved Roadways and parking lots	RWMW	N/A	N/A	N/A
-----	-----	---------------------	-----------------------------------	------	-----	-----	-----

- (1) Method of Control abbreviations: FE - Full Enclosure, PE - Partial Enclosure, MD - Minimization of Material Drop Height, N – None, MC – Moisture Control, DSS – Dust suppressant Spray, CY – Cyclones, SC – Scrubbers, ME – Mist Eliminator, RWMW – Water Truck with Manufactured Pressurized sprays
- (2) I – Year Installed, M- Year Modified, A-Year Added , N-Not installed yet

## 1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2183K	April 28, 2008

## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source Performance
<b>CBI</b>	Confidential Business Information		Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations		
<b>CO</b>	Carbon Monoxide	<b>pph</b>	Pounds per Hour
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>ppm</b>	Parts per Million
<b>DAQ</b>	Division of Air Quality	<b>PSD</b>	Prevention of Significant Deterioration
<b>DEP</b>	Department of Environmental Protection	<b>psi</b>	Pounds per Square Inch
<b>FOIA</b>	Freedom of Information Act	<b>SIC</b>	Standard Industrial Classification
<b>HAP</b>	Hazardous Air Pollutant		
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>m</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>mm</b>	Million	<b>USEPA</b>	United States Environmental Protection Agency
<b>mmBtu/hr</b>	Million British Thermal Units per Hour	<b>UTM</b>	Universal Transverse Mercator
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards	<b>VOC</b>	Volatile Organic Compounds
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
  - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.



[45CSR§30-6.6.a.]

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.
- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39 40]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

## **2.16. Need to Halt or Reduce Activity not a Defense**

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

## **2.17. Emergency**

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**[45CSR§30-5.7.c.]**

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

**[45CSR§30-5.7.d.]**

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**[45CSR§305.7.e.]**

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

**[45CSR§30-5.2.a.]**

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**[45CSR§30-5.1.f.5.]**

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**[45CSR§30-4.2.]**

## **2.21. Permit Shield**

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§305.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§305.1.e.]**

## **2.24. Property Rights**

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
  - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
  - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.



- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

**[40 C.F.R. 68]**

- 3.1.9. Fugitive dust control methods, such as full enclosures, partial enclosures, and water sprays, proposed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments or supplements thereto shall be installed, operated, and maintained in such a manner so as to minimize the generation and atmospheric entrainment of fugitive particulate emissions. A freeze protection plan shall be incorporated to insure that the wet suppression systems remain operational at all times. In accordance with the information filed, the methods of control given in the Equipment Table in Section 1.0. of this permit shall be installed, maintained, and operated so as to minimize the emission of PM (particulate matter) and PM<sub>10</sub> (particulate matter less than ten microns in diameter).

**[45CSR13, R13-2183, A.10.]**

- 3.1.10. The permittee shall maintain a water truck on site and in good operating condition, and shall utilize same to apply water, or a mixture of water and an environmentally acceptable dust control additive, hereinafter referred to as solution, as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used.

The spraybar shall be equipped with commercially available spray nozzles, of sufficient size and number, so as to provide adequate coverage to the surface being treated.

The pump delivering the water, or solution shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water, or solution, and at a sufficient pressure.

**[45CSR13, R13-2183, A.11.]**

- 3.1.11. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any fugitive dust control system, coal processing and conveying equipment, coal storage system, or coal transfer and loading system which is twenty percent (20%) opacity or greater. These opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. Note that the regulatory citations 40 C.F.R. §§ 60.254(a), 60.11(c), and 45CSR16 (below) apply only to the 40 C.F.R. 60 Subpart Y affected facilities, which are those listed in Section 5.0. of this permit.

**[45CSR13, R13-2183, B.2. & B.4; 45CSR§5-3.4.; 40 C.F.R. §60.254(a); 40 C.F.R. §60.11(c); 45CSR16]**

- 3.1.12. No person shall cause, suffer, allow or permit a coal preparation plant or handling operation to operate that is not equipped with a fugitive dust control system. This system shall be operated and maintained in such a manner as to minimize the emission of particulate matter into the open air.

**[45CSR13, R13-2183, B.2., and 45CSR§5-6.1.]**

- 3.1.13. The owner or operator of a coal preparation plant or handling operation shall maintain dust control of the premises and owned, leased, or controlled access roads by paving, or other suitable measures. Good operating practices shall be observed in relation to stockpiling, car loading, breaking, screening, and general maintenance to minimize dust generation and atmospheric entrainment.

[45CSR13, R13-2183, B.2., and 45CSR§5-6.2.]

- 3.1.14. The permitted facility shall be constructed and operated in accordance with information filed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments thereto.

[45CSR13, R13-2183, A.1.]

### 3.2. Monitoring Requirements

- 3.2.1. The permittee shall conduct monitoring/recordkeeping/reporting as follows: [Not required for stockpiles and haulroads – OS1, ST-14, ST-2, ST-11, ST-12, ST-13, ST-16, PRP, URP] To determine compliance with the opacity limit of permit condition 3.1.11., the permittee shall conduct weekly visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for all coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed. Records of all observations shall be maintained in accordance with permit condition 3.4.4.

[45CSR§30-5.1.c.]

- 3.2.2. The permittee shall inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 3.2.3. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.

[45CSR§30-5.1.c.]

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment,

such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language.
  2. The result of the test for each permit or rule condition.
  3. A statement of compliance or non-compliance with each permit or rule condition.

**[WV Code §§ 2254(a)(14-15) and 45CSR13]**

- 3.3.2. Any stack venting thermal dryer exhaust gases and/or air table exhaust gases or exhaust gases or air from any air pollution control device shall include straight runs of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. Flow straightening devices shall be required where cyclonic gas flow would exist in the absence of such devices.  
**[45CSR13, R13-2183, B.2., 45CSR§5-12.6.]**
- 3.3.3. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, the owner or operator of such facility shall conduct performance test(s) to determine compliance with emission limitations set forth in 40 C.F.R. §60.254(a) and furnish a written report of the results of such performance test(s).

**[40 C.F.R. §60.8(a), 45CSR16, and 45CSR13, R13-2183, B.4.] [DHRC-4, C120, C121 and C122]**

### **3.4. Recordkeeping Requirements**

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

**[45CSR§30-5.1.c.2.A.]**

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

**[45CSR§30-5.1.c.2.B.]**

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§30-5.1.c. State-Enforceable only.]**

3.4.4. A record of each visible emissions observation required by permit condition 3.2.1. shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

**[45CSR§30-5.1.c.]**

### **3.5. Reporting Requirements**

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[45CSR§§30-4.4. and 5.1.c.3.D.]**

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

**[45CSR§30-5.1.c.3.E.]**

- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**

**US EPA:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV  
25304

~~Section Chief~~ [Associate Director](#)  
~~Office of Air Enforcement and Compliance Assistance~~  
~~(3AP20)~~  
U. S. Environmental Protection Agency, Region III  
[Enforcement and Compliance Assurance Division](#)  
[Air Section \(3ED21\)](#)  
1650 Arch Street  
Philadelphia, PA 19103-2029

**DAQ Compliance and Enforcement<sup>1</sup>:**

DEPAirQualityReports@wv.gov

<sup>1</sup>For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

**[45CSR§30-8.]**

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

**DAQ:**

DEPAirQualityReports@wv.gov

**US EPA:**

R3\_APD\_Permits@epa.gov

**[45CSR§30-5.3.e.]**

- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

**DAQ:**

DEPAirQualityReports@wv.gov

**[45CSR§30-5.1.c.3.A.]**

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
  1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
  2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
  3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
  4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

**[45CSR§30-5.1.c.3.C.]**

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

**[45CSR§30-5.1.c.3.B.]**

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

**[45CSR§30-4.3.h.1.B.]**

### 3.6. Compliance Plan

- 3.6.1. There is no compliance plan since the permittee certified compliance with all applicable requirements in the renewal application.

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- 3.7.3.

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the <del>third</del> <u>fourth</u> permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the <del>second</del> <u>third</u> renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-02A, 001-02B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee’s calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p>

	Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.
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#### 4.0 Thermal Dryer [emission point ID(s): TD1]

##### 4.1. Limitations and Standards

4.1.1. The thermal dryer shall not be operated more than 7,083 hours per year. The permittee shall maintain records showing the number of hours each calendar day the thermal dryer was in operation.

[45CSR13, R13-2183, A.2.]

4.1.2. Emissions from the thermal dryer shall not exceed the following hourly and annual limits:

Pollutant	Emissions Limitations	
	One-Hour Average (lb/hour)	Annual (ton/year)
Volatile Organic Compounds (VOCs)	41.3	146
SO <sub>2</sub>	50.3	178
NO <sub>x</sub>	93.9	332
CO	50.3	178
Particulate Matter (PM)	77.0	272

[45CSR13, R13-2183, A.4.]

4.1.3. Scrubber water flow shall be maintained at a minimum of 2,240 gpm. The scrubber water system shall receive clean water from the clarifier water sump and shall discharge dirty water to the clarifier centerwell for solids removal. Pressure drop across the scrubber shall be adjusted as required to control particulate matter emissions. Alkaline agents may be added to the scrubber water to control sulfur dioxide emissions.

[45CSR13, R13-2183, A.5.]

4.1.4. No person shall cause, suffer, allow, or permit the emission into open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 ppmv by volume from existing source operations.

[45CSR13, R13-2183, B.3., and 45CSR§10-4.1.]

4.1.5. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any stack which is twenty percent (20%) opacity or greater, except as noted in 45CSR§5-3.2.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.1.]

4.1.6. The provisions of permit condition 4.1.5. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period or periods aggregating no more than five (5) minutes in any sixty (60) minute period during operation.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.2.]

4.1.7. The provisions permit conditions 4.1.5. and 4.1.6. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period of up to eight (8) minutes in any operating day for the purposes of building a fire of operating quality in the fuel burning equipment of a thermal dryer.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.3.]

- 4.1.8. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from the thermal dryer exhaust in excess of 0.083 grains per standard cubic foot.  
**[45CSR13, R13-2183, B.2., 45CSR§5-4.1.b., and 45CSR5 Appendix 1.2.]**
- 4.1.9. No person shall circumvent 45CSR§5-4.1.b. (permit condition 4.1.8) by adding additional gas to any dryer exhaust or group of dryer exhaust for the purpose of reducing the grain loading.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-4.2.]**
- 4.1.10. No person shall cause, suffer, allow or permit the exhaust gases from a thermal dryer to be vented into the open air at an altitude of less than eighty (80) feet above the foundation grade of the structure containing the dryer or less than ten (10) feet above the top of the said structure or any adjacent structure, whichever is greater. In determining the desirable height of a plant stack, due consideration shall be given to the local topography, meteorology, the location of nearby dwellings and public roads, the stack emission rate, and good engineering practice as set forth in 45CSR20.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-4.3.]**

## **4.2. Monitoring Requirements**

Note: For purposes of complying with 40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM), the words “*indicator*” or “*indicators*” shall mean the specific parameters to be monitored, measured, polled, or sampled (as applicable). Operation of the equipment while each indicator is within the acceptable range (defined below for each indicator) will provide a reasonable assurance of compliance with applicable emission limitations or standards for the anticipated range of operations of the equipment.

- 4.2.1. **Thermal Dryer Exhaust Temperature** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the temperature of the gas stream at the exit of the thermal dryer between the dryer exhaust fan and the venturi scrubbers. An excursion shall be defined as a 1-hour average temperature outside of the acceptable thermal dryer exhaust temperature defined as 170°F to 240°F. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus three degrees Fahrenheit ( $\pm 3$  °F) and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 1 of 3 for particulate matter control under the 40 C.F.R. 64 plan.  
**[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.1. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]**

- 4.2.2. **Scrubber Water Supply Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the water supply pressure to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber water supply pressure defined as 7-psig. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus five percent ( $\pm 5\%$ ) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 2 of 3 for particulate matter control, and also Indicator 1 of 3 for sulfur dioxide control, under the 40 C.F.R. 64 plan. [45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.b. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]
- 4.2.3. **Scrubber Inlet Static Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss through the scrubber. The pressure drop will be measured at the inlet to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber inlet static pressure defined as 18 inches of water column. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus one inch ( $\pm 1$  in.) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 3 of 3 for particulate matter control under the 40 C.F.R. 64 plan. [45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.a. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]
- 4.2.4. **Dryer Fuel Coal Sulfur Content** – The permittee shall sample in accordance with approved ASTM methods on at least a daily basis the fuel coal burned in the furnaces and have the samples analyzed for sulfur and BTU content. The analysis results shall be accurate within  $\pm 0.1$  weight percent. Result of these analyses shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. If the sulfur content exceeds 1.09 percent on a dry basis, the permittee shall add sodium hydroxide solution in accordance with permit condition 4.2.5. to the scrubber water and/or to the coal being dried to reduce sulfur dioxide emissions. Compliance with the more stringent limit (1.09 weight percent before adding NaOH) proposed by the permittee, and enforceable under 45CSR§30-12.7., ensures compliance with the 1.22 weight percent threshold prior to NaOH addition set forth by R13-2183, A.3. An excursion shall be defined as exceeding the 1.09 weight percent limit without addition of sodium hydroxide in accordance with permit condition 4.2.5. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). This permit condition accounts for Indicator 2 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan. [45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.; 45CSR§10-8.2.c.]

- 4.2.5. **Sodium Hydroxide (NaOH) Addition Rate** – The metering pump shall be used to add 0.51 gallons per minute of 20% sodium hydroxide solution to the scrubber water and/or to the coal being dried based upon sulfur content determined under permit condition 4.2.4. The metering pump used to add NaOH solution shall be calibrated monthly during NaOH addition by measuring the time to deliver a specified volume of the solution. The minimum accuracy of the metering pump shall be  $\pm 0.1$  gallons per minute. The monitoring system shall continually sense the indicator (NaOH addition rate), poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This permit condition accounts for Indicator 3 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan.  
[45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.]
- 4.2.6. To determine compliance with the opacity limits of permit condition 4.1.5., the permittee shall conduct daily visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for the thermal dryer. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.  
[45CSR§30-5.1.c.]
- 4.2.7. The thermal dryer unit(s) included in this permit shall be observed visually during periods of building a fire of operating quality and minimization efforts taken to ensure particulate matter emissions of sixty percent (60 %) opacity for a period of up to 8 minutes in any operating day is not exceeded during such activities.  
[45CSR§30-5.1.c.]
- 4.2.8. **Proper maintenance.** At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
[40 C.F.R. § 64.7(b); 45CSR§30-5.1.c.]
- 4.2.9. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 C.F.R. 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.  
[40 C.F.R. § 64.7(c); 45CSR§30-5.1.c.]

#### 4.2.10. **Response to Excursions or Exceedances**

(1) Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 C.F.R. § 64.7(d); 45CSR§30-5.1.c.]

- 4.2.11. **Documentation of need for improved monitoring.** After approval of monitoring under 40 C.F.R. 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 C.F.R. § 64.7(e); 45CSR§30-5.1.c.]

- 4.2.12. The permittee shall maintain daily records of the coal throughput of the thermal dryer and record the rolling yearly total of coal. A rolling yearly total shall mean the sum of coal throughput at any given time for the previous twelve (12) months.

[45CSR§30-5.1.c.]

### 4.3. **Testing Requirements**

- 4.3.1. At such reasonable times as the Secretary may designate, the owner or operator of a source(s) of any fuel burning unit(s) manufacturing process source(s) or combustion source(s) may be required to conduct or have conducted tests to determine the compliance of such source(s) with the emission limitations of section 3, 4 or 5 of 45CSR10. Such tests shall be conducted in accordance with the appropriate test methods 40 C.F.R. 60, Appendix A, Method 6, Method 15 or other equivalent EPA testing method approved by the Secretary. The Secretary, or his or her duly authorized representative, may at his or her option witness or conduct such tests. Should the Secretary exercise his or her option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports to be located in such a manner as the

Secretary may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.a.]**

- 4.3.2. The Secretary, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§10-3.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.b.]**

- 4.3.3. At the request of the Secretary the owner and/or operator of a source shall install such stack gas monitoring devices as the Secretary deems necessary to determine compliance with the provisions of 45CSR§10-4.1. The data from such devices shall be readily available at the source location or such other reasonable location that the Secretary may specify. At the request of the Secretary, or his or her duly authorized representative, such data shall be made available for inspection or copying. Failure to promptly provide such data shall constitute a violation of 45CSR10.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.a.]**

- 4.3.4. Prior to the installation of calibrated stack gas monitoring devices, sulfur dioxide emission rates shall be calculated on an equivalent fuel sulfur content basis.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.b.]**

- 4.3.5. The permittee ~~shall~~ was required to conduct particulate matter stack testing no later than September 26, 2017, ~~and shall~~ to establish and/or verify existing parameter indicator ranges. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

The Director shall be furnished with a written report of the results of such testing and established indicator ranges. The permittee shall use Method 5 or an alternative method approved by the Director for such testing. Parameter indicator ranges shall be re-established or verified for the exhaust temperature of the thermal dryer, water pressure to the scrubber, and the scrubber inlet static pressure. The permittee shall re-establish and/or verify these indicator ranges and operate within these ranges to provide a reasonable assurance that the thermal dryer unit is in compliance with opacity and particulate loading limits. The permittee shall take immediate corrective action when a parameter falls outside the indicator range established for that parameter and shall record the cause and corrective measures taken. The permittee shall also record the following parameters during such testing:

- a. Opacity readings on the exhaust stack following the procedures of Method 9;
- b. Amount of coal burned and the amount of coal dried;
- c. Coal drying temperature and residence time in the dryer;
- d. Temperature of the gas stream at the exit of the thermal dryer;
- e. Flow rate through the dryer and converted to dry standard cubic feet;
- f. Water pressure to the control equipment; and
- g. Scrubber inlet static pressure. The static pressure at the inlet of the scrubber will be measured.

Subsequent testing to determine compliance with the particulate loading limitations permit condition 4.1.8. shall be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Initial	$\leq 50\%$ of particulate loading limit	Once/5 years
Initial	between 50% and 90 % of particulate loading limit	Once/3 years
Initial	$\geq 90\%$ of particulate loading limit	Annual
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual

~~Note: Previous testing was performed in 2012. Based upon those results, testing was not required again until 2017.~~

[45CSR§30-5.1.c.]

#### 4.4. Recordkeeping Requirements

- 4.4.1. A record of each visible emissions observation shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the daily inspections, and the times the thermal dryer air pollution control system is inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 4.4.2. All thermal dryer scrubber malfunctions must be documented in writing. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. At a minimum, the following information must be documented for each malfunction:

- a. Cause of malfunction
- b. Steps taken to:
  - i. correct the malfunction



- ii. minimize emissions during malfunction
- c. Duration of malfunction in hours
- d. Estimated increase in emissions during the malfunction
- e. Any change/modifications to equipment or procedures that would help prevent future recurrence of malfunction.

**[45CSR13, R13-2183, B.1.]**

#### **4.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- (2) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**[40 C.F.R. §64.9(b); 45CSR§30-5.1.c.]**

### **4.5. Reporting Requirements**

#### **4.5.1. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.
- (2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:
  - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - (iii) A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

**[40 C.F.R. §64.9(a); 45CSR§30-5.1.c.]**

#### **4.6. Compliance Plan**

4.6.1. N/A

**5.0 Transfer Points Subject to 40 C.F.R. 60, Subpart Y [emission point ID(s): Truck Dumping [at ST-10 (T4-8) and DH-3 (T93)]; Endloader [at OS-1 (T92), ST-2 (T77, T100 and T113), ST-10 (T105 and T4-9), ST-11 (T102), ST-13 (T119), ST-14 (T104), ST-16 (T135), DH-3 (T94, T95), DHRC-4 (T124, T125)]; Rail Car Loading Bin ST-6 (T25 and T26); Mine Car Dump MCD-1 (T72A and T72B); Conveyors: C24 (T10-1, T10-2 and T10-3), C31 (T10-4), C31A (T11), C36 Feeder (T12-3), C118 (T16), C132 (T19, T19A), SC-1 (T19B), ST-5 Reclaim System (T20), C139 (T21), ST-13 Reclaim System (T22), RC-1 (T23), C141 (T24), C152 (T25), ST-6 Reclaim System (T26), S3A (T111 and T112), S7 (T29), ST-11 Reclaim System (T32), S3 (T33), S3B (T34), C128-3 (T42), C128-4 (T43), 8A (T46-2), S5 (T49), S10 (T50), RCT-1 (T52), C11-4 (T73, T74), RC-5 (T81), C10-3 (T96), C128-5 (T44), C128-6 (T121), C120 (T127A, T127B), C121 (T128, T129), C122 (T130); Breaker: S6 (T54, T27-5, and T28-3); Screen: SS-1 (T50, T51, T53, and T54)]**

### 5.1. Limitations and Standards

5.1.1. In accordance with the information filed, the following processing limits shall not be exceeded:

Type of Material and Location Where Processed	Maximum Amount to be Processed (TPY)
Raw coal feed from No. 50 Mine to Scalping Screen (SS-1)	6,900,000
Raw coal feed to Wet Wash Circuit/Preparation Plant (1,500 ton/hr * 7,083 hr/yr)	10,630,000
Feed coal from Wash Circuit to Thermal Dryer (800 ton/hr * 7,083 hr/yr)	5,670,000
Trucked Coal and/or Coal Fines from Conveyor RC-5 to Conveyor RC-1.	860,000
Clean coal/Coal Fines from Loading Bin ST-6 to railroad cars	8,100,000

[45CSR13, R13-2183, A.6.]

5.1.2. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 C.F.R. §60.11(d), 45CSR16, and 45CSR13, R13-2183, B.4.]

### 5.2. Monitoring Requirements

5.2.1. Refer to permit conditions 3.2.1. and 3.2.2.

### 5.3. Testing Requirements

5.3.1. Reserved.

#### **5.4. Recordkeeping Requirements**

5.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit condition 5.1.1., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachment A. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.  
**[45CSR13, R13-2183, B.6. and A.9.]**

5.4.2. Refer to permit conditions 3.4.4.

#### **5.5. Reporting Requirements**

5.5.1. Reserved.

#### **5.6. Compliance Plan**

5.6.1. N/A

## 6.0 Coal Storage and Stockpiles [emission point ID(s): OS-1, ST-2, ST-10, ST-11, ST-13, ST-14, ST-16]

### 6.1. Limitations and Standards

- 6.1.1. In accordance with the information filed, the following storage and truck delivery limits shall not be exceeded:

Stockpile/Bin ID No.	Material Stored	Maximum in Storage (tons)	Maximum to be Delivered (TPY) <sup>1</sup>
Stockpile OS-1	raw coal	631,000	250,000
Stockpile ST-2	raw coal	77,000	180,000
Storage Pit ST-10	raw coal	≈ 50	550,000 <sup>2, 3, 6</sup>
Stockpile ST-11	raw coal	1,106,000	100,000 <sup>4</sup>
Stockpile ST-13	clean coal	514,000	360,000 <sup>5</sup>
Stockpile ST-14	raw coal	54,000	750,000 to 1,000,000 <sup>6</sup>
Stockpile ST-16	coal	120,000	360,000 <sup>7</sup>
	coal fines	Combined	500,000 <sup>8</sup>

- (1) Maximum quantity of coal to be delivered via trucks by other suppliers from outside sources.  
(2) Less the amount delivered directly to Stockpile ST-2.  
(3) 0 TPY up to 250,000 TPY of the 550,000 TPY will pass over the truck scale near the refuse road.  
(4) Less the amount transferred from other stockpiles.  
(5) Up to 360,000 TPY combined may be received at or shipped from ST-13 by truck.  
(6) The sum of coal trucked to Storage Pit ST-10 via the truck scale and the coal trucked to Stockpile ST-14 shall not exceed 1.0 million TPY.  
(7) Up to 360,000 TPY of coal may be received at or shipped from ST-16 by truck.  
(8) Up to 500,000 TPY of coal fines may be received at ST-16 by truck.

### [45CSR13, R13-2183, A.7.]

- 6.1.2. In accordance with the information filed, the following transfer limits between coal storage areas shall not be exceeded:

Originating Stockpile ID No.	Maximum Amount to be Transferred to Stockpiles Listed Below (TPY) <sup>1</sup>						
	OS-1	ST-2	ST-10	ST-11	ST-13	ST-14	ST-16
OS-1	-----	100,000	350,000	100,000	100,000	100,000	100,000
ST-2	100,000	-----	280,000 <sup>3</sup>	100,000	100,000	100,000	100,000
ST-10	0	0	-----	0	0	0	0
ST-11	100,000	100,000	100,000	-----	100,000	100,000	100,000
ST-13	100,000	100,000	100,000	100,000	-----	100,000	100,000
ST-14	100,000	100,000	100,000	100,000	100,000	-----	100,000
ST-16	100,000	100,000	100,000	100,000	100,000	100,000	-----
<b>All Areas<sup>2</sup></b>	100,000	100,000	530,000	100,000	100,000	100,000	100,000

- (1) The quantities to be received for any single storage area are not additive.  
(2) The last row summarizes the maximum amount that could be transferred to each storage area from all other storage areas.  
(3) The permittee has the option to alternatively load up to 180,000 TPY into a railcar at ST-2 in lieu of transferring it to ST-10.

**[45CSR13, R13-2183, A.8.]**

- 6.1.3. The permittee shall maintain and operate a vacuum truck along the paved entrance(s) to Stockpile OS-1 at all times during which truck traffic is present, either receiving or shipping coal.

**[45CSR13, R13-2183, A.12.]**

## **6.2. Monitoring Requirements**

- 6.2.1. Reserved.

## **6.3. Testing Requirements**

- 6.3.1. Reserved.

## **6.4. Recordkeeping Requirements**

- 6.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit conditions 6.1.1. and 6.1.2., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments B and C. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.

**[45CSR13, R13-2183, B.6. and A.9.]**

## **6.5. Reporting Requirements**

- 6.5.1. Reserved.

## **6.6. Compliance Plan**

- 6.6.1. N/A

## **7.0 Refuse Bin, Refuse Area, Refuse Stockpile [emission point ID(s): ST-7, ST-8, ST-12]**

### **7.1. Limitations and Standards**

- 7.1.1. In order to prevent and control air pollution from coal refuse disposal areas, the operation of coal refuse disposal areas shall be conducted in accordance with the standards established by 45CSR§5-7 (7.1.2. through 7.1.8.).  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.1.]**
- 7.1.2. Coal refuse is not to be deposited on any coal refuse disposal area unless the coal refuse is deposited in such a manner as to minimize the possibility of ignition of the coal refuse.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.2.]**
- 7.1.3. Coal refuse disposal areas shall not be so located with respect to mine openings, tipples, or other mine buildings, unprotected coal outcrops or steam lines, that these external factors will contribute to the ignition of the coal refuse on such coal refuse disposal areas.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.3.]**
- 7.1.4. Vegetation and combustible materials shall not be left on the ground at the site where a coal refuse pile is to be established, unless it is rendered inert before coal refuse is deposited on such site.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.4.]**
- 7.1.5. Coal refuse shall not be dumped or deposited on a coal refuse pile known to be burning, except for the purpose of controlling the fire or where the additional coal refuse will not tend to ignite or where such dumping will not result in statutory air pollution.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.5.]**
- 7.1.6. Materials with low ignition points used in the production or preparation of coal, including but not limited to wood, brattice cloth, waste paper, rags, oil and grease, shall not be deposited on any coal refuse disposal area or in such proximity as will reasonably contribute to the ignition of a coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.6.]**
- 7.1.7. Garbage, trash, household refuse, and like materials shall not be deposited on or near any coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.7.]**
- 7.1.8. The deliberate ignition of a coal refuse disposal area or the ignition of any materials on such an area by any person or persons is prohibited.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.8.]**

- 7.1.9. Each burning coal refuse disposal area which allegedly causes air pollution shall be investigated by the Secretary in accordance with the following: With respect to all burning coal refuse disposal areas, the person responsible for such coal refuse disposal areas or the land on which such coal refuse disposal areas are located shall use due diligence to control air pollution from such coal refuse disposal areas. Consistent with the declaration of policy and purpose set forth in section one of chapter twenty-two, article five of the code of West Virginia, as amended, the Secretary shall determine what constitutes due diligence with respect to each such burning coal refuse disposal area. When a study of any burning coal refuse disposal area by the Secretary establishes that air pollution exists or may be created, the person responsible for such coal refuse disposal area or the land on which such coal refuse disposal area is located shall submit to the Secretary a report setting forth satisfactory methods and procedures to eliminate, prevent, or reduce such air pollution. The report shall be submitted within such time as the Secretary shall specify. The report for the elimination, prevention or reduction of air pollution shall contain sufficient information, including completion dates, to establish that such program can be executed with due diligence. If approved by the Secretary, the corrective measures and completion dates shall be embodied in a consent order issued pursuant to W.Va. Code 22-5-1 et seq. If such report is not submitted as requested or if the Secretary determines that the methods and procedures set forth in such report are not adequate to reasonably control such air pollution, then a hearing will be held pursuant to the procedures established by W.Va. Code 22-5. [45CSR13, R13-2183, B.2., and 45CSR§§5-8.1. and 8.3.]

- 7.1.10. The maximum amount of refuse in storage at the Refuse Storage ST-12 shall not exceed 26,000 tons. [45CSR13, R13-2183, A.7.]

## **7.2. Monitoring Requirements**

- 7.2.1. Reserved.

## **7.3. Testing Requirements**

- 7.3.1. Reserved.

## **7.4. Recordkeeping Requirements**

- 7.4.1. For the purpose of determining compliance with the maximum storage limit set forth in permit condition 7.1.10., the permittee shall maintain daily records of the amount (in tons) of refuse in storage at the beginning of each day, the amounts transferred to and from ST-12 each day, and the amount of refuse in storage at the end of each day. To facilitate this recordkeeping, an example data form is provided as Attachment D. [45CSR§30-5.1.c.]

## **7.5. Reporting Requirements**

- 7.5.1. Reserved.

## **7.6. Compliance Plan**

- 7.6.1. N/A



# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900006-2022**  
Application Received: **August 31, 2021**  
Plant Identification Number: **03-054-10900006**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **302 South Jefferson Street, Roanoke, VA 24011**

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Physical Location:	Pineville, Wyoming County, West Virginia
UTM Coordinates:	456.10 km Easting • 4,155.40 km Northing • Zone 17
Directions:	At Pineville, take Route 10 South approximately one mile, turn right onto Route 16 South, travel approximately one mile before turning left onto Pinnacle Creek Road and the facility will be located on the right side of the road.

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### Facility Description

The facility is a coal preparation plant which processes raw coal from an underground bituminous coal mine plus other raw coal sources. The preparation process involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, low sulfur coal product. Operations at the plant include breaking, crushing, handling, screening, washing, and drying. The facility is characterized by SIC code 1222.

## Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Carbon Monoxide (CO)	178	0.00
Nitrogen Oxides (NO <sub>x</sub> )	333	0.00
Particulate Matter (PM <sub>2.5</sub> )	168	1.61
Particulate Matter (PM <sub>10</sub> )	355	9.88
Total Particulate Matter (TSP)	744	26.44
Sulfur Dioxide (SO <sub>2</sub> )	178	0.00
Volatile Organic Compounds (VOC)	186	0.00
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Benzene	2.33	0.00
Hexane	4.66	0.00
Hydrochloric acid	8.01	0.00
Aggregate HAPs <sup>2</sup>	17.62	<0.01

<sup>1</sup> The 2020 actual emissions are from the State and Local Emissions Inventory System (SLEIS). Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and have not operated since 2017. The actual emissions from 2020 are from coal being trucked to the facility and then transferred to the railcar loadout for shipment.

<sup>2</sup> The actual aggregate HAPs is the sum of the specific HAPs listed in the 2020 SLEIS report.

## Title V Program Applicability Basis

This facility has the potential to emit 178 tpy of CO, 333 tpy of NO<sub>x</sub>, 355 tpy of PM<sub>10</sub>, 178 tpy of SO<sub>2</sub>, and 186 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pinnacle Mining Company, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Coal Preparation and Handling Operations
	45CSR6	Open burning prohibited.
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction/Modification
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Y	Coal Preparation Plants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2183K	April 28, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

- Title V Boiler Plate Changes.** In Section 2.11.4., the reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.  
  
In Section 2.22.1., the reference notation was changed to delete 45CSR38 because it has been repealed.  
  
In Section 3.5.3., the contact information for EPA was updated.
- Miscellaneous Revision.** In Section 3.7.3. in the third row titled 40 C.F.R. Part 64, the first sentence under Rationale was updated because this is now the fourth renewal for this facility and the third sentence was updated because no changes have been made since the third renewal.
- Particulate Matter Stack Testing of Thermal Dryer.** Condition 4.3.5. of the current Title V permit required PM stack testing of the thermal dryer TD1 no later than September 26, 2017. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as

practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

4. **Miscellaneous Revision.** In the Example Data Form Attachments, the Title V permit number suffix has been updated from 2017 to 2022 in Attachments A through D.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the fourth permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the third renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-2A, 001-2B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee’s calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p> <p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p>

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: (Date of Notice Publication)  
Ending Date: (Publication Date PLUS 30 Days)

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Daniel P. Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41902  
[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not Applicable.



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Re: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal**

1 message

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**McCumbers, Carrie** <carrie.mccumbers@wv.gov>  
To: "Roberts, Daniel P" <daniel.p.roberts@wv.gov>

Tue, May 24, 2022 at 4:21 PM

Dan,

I have a few very minor comments on the permit and fact sheet. I don't have any comments on the notice or attachments. After you make the changes, you can go to draft/proposed. I don't need to see the revised documents. If you need help adding the header row to the emission units table, just let me know and I can help you.

Thanks,  
Carrie

On Mon, May 23, 2022 at 8:01 AM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:  
Carrie,

Hey. I have attached the draft/proposed fact sheet and permit for the above referenced facility. Please review them and let me know if you have any comments or questions.

I will stop by or call to talk about the proposed stack testing language that has been incorporated.

Thanks,  
Dan

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**2 attachments****R30-10900006-2022 Draft Fact Sheet 5-23-22 Carrie's comments.doc**  
111K**R30-10900006-2022 Draft Permit 5-23-22 Carrie's comments.docx**  
342K

**West Virginia Department of Environmental Protection**

*Harold D. Ward  
Cabinet Secretary*

# Permit to Operate



Pursuant to  
**Title V**  
of the Clean Air Act

*Issued to:*  
**Pinnacle Mining Company, LLC**  
**Pinnacle Preparation Plant**  
**R30-~~30~~-10900006-2022**

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Laura M. Crowder  
Director, Division of Air Quality

*Issued: [Date of issuance] • Effective: [Equals issue date plus two weeks]  
Expiration: [5 years after issuance date] • Renewal Application Due: [6 months prior  
to expiration]*

Permit Number: **R30-10900006-2022**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **~~P.O. Box 338, Pineville, West Virginia 24874~~**  
**302 South Jefferson Street, Roanoke, VA 24011**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

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Facility Location:	Pineville, Wyoming County, West Virginia
Mailing Address:	<del>P.O. Box 338, Pineville, West Virginia 24874</del> <u>302 South Jefferson Street, Roanoke, VA 24011</u>
Telephone Number:	<del>304-732-9720</del> <u>540-314-0115</u>
Type of Business Entity:	LLC
Facility Description:	The facility is a coal preparation plant which processes raw coal from an <del>associated</del> underground bituminous coal mine plus other raw coal sources. The preparation <u>process</u> involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, <del>and</del> low sulfur coal <u>product</u> . Operations at the plant include breaking, crushing, handling, screening, washing and drying.
SIC Codes:	1222
UTM Coordinates:	456.10 km Easting \$ 4,155.40 km Northing \$ Zone 17

Permit Writer: Daniel P. Roberts

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

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**ATTACHMENT A – Monthly Processing Rate Report**

**ATTACHMENT B – Monthly Delivery Rate Report from Outside Suppliers**

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**Certification of Data Accuracy**

## 1.0 Emission Units and Active R13, R14, and R19 Permits

### 1.1 Emission Units

Equipment ID Number	Design Capacity	Year Installed / Modified <sup>(2)</sup>	Description	Method of Control <sup>(1)</sup>	Associated Transfer Points/Equipment		
					Location: B - Before A - After	ID. No.	Method of Control <sup>(1)</sup>
Storage Addition							
OS-1	631,000 Tons	I – 1998 M- 1999 M-2000,2001, 2002	Open Stockpile OS-1 - Receives coal via dump truck. A front-endloader is used to move coal from the Open Stockpile OS-1 to trucks for hauling to Stockpiles ST-2, ST-11, ST-13, ST-14, ST-16, or Storage Pit ST-10.	N	B	T65	MD
					A	T92	N
Rotary Breakers (C11-1 & C11-2) Circuit							
ST-14	54,000 Tons	I - 2001 M-2002	Raw Coal Open Stockpile ST-14 - Receives coal by truck from Stockpile OS-1 and off site suppliers and transfers it via front-endloader to Dump Hopper DH-3 and/or front endloader to truck.	N	B  A	T93  T94 T104	MC  PE MC
DH-3	45 Tons	I – 2001	Dump Hopper DH-3 - Receives coal via truck and/or front-endloader from Raw Coal Open Stockpile ST-14 and transfers it to Conveyor C10-3.	PE	B  A	T94  T95	PE  PE
C10-3	1,000 TPH	I – 2001	Conveyor C10-3 - Receives coal from Dump Hopper DH-3 and transfers it to Mine Car Dump MCD-1.	PE	B  A	T95  T96	PE  FE
MCD-1	40 Tons	I – 2001	Mine Car Dump MCD-1 - Receives coal from Conveyor C10-3 and transfers it to Conveyors C11 - 1 and/or C11-2 via feeders in the bottom of MCD-1.	PE	B A	T96 T72A, T72B	PE FE FE
C11-1	1,000 TPH	I – 1970	Conveyor C11-1 - Receives coal from Mine Car Dump MCD-1, Conveyor S3A and Conveyor C11-4, and transfers it to Rotary Breaker 13-1.	PE	B  A	T72A T73 T75 T111	FE PE PE PE
C11-2	1,000 TPH	I – 1970	Conveyor C11-2 - Receives coal from Mine Car Dump MCD-1, Conveyor C11-4, and Conveyor S3A and transfers it to Rotary Breaker 13-2.	PE	B  A	T72B T74 T76 T112	FE PE PE PE
C11-4	800 TPH	I -1979	Conveyor C11-4 - Receives coal from the Storage Pit ST-10 and transfers it to Belt Conveyor C11-1 and/or Belt Conveyor C11-2.	PE	B A	T4-9 T73 T74	PE PE PE
Rotary Breaker 13-1 (13-1E)	1,000 TPH	I – 1970	Rotary Breaker 13-1 - Receives coal from Conveyor C11-1. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T75  T8-1 T9-1A	PE  PE PE
Rotary Breaker 13-2 (13-2E)	1,000 TPH	I - 1970	Rotary Breaker 13-2 - Receives coal from Conveyor C11-2. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T76  T8-2 T9-1B	PE  PE PE
8A	Continued Under Refuse Circuit						
C24	Continued Under Raw Coal Handling System						

Raw Coal Handling System							
Equipment ID Number	Design Capacity	Year Installed / Modified <sup>(2)</sup>	Description	Method of Control <sup>(1)</sup>	Associated Transfer Points/Equipment		
					Location: B - Before A - After	ID. No.	Method of Control <sup>(1)</sup>
Raw Coal Handling System							
S10	4000 TPH	I - 1986 M – 1998 M – 2006	Conveyor S10 - Receives coal from No. 50 Mine and transfers it to Scalping Screen SS-1.  Equipped with SS-1 bypass chute to divert coal directly to ST-11	PE	B  A	----  T50 T120	----  FE N
S3A	2,500 TPH	I-1986 M-2002	Conveyor S3A – Receives coal from Scalping screen SS-1 and transfers it to Belt Conveyor C11-1 and/or C11-2.	PE	B  A	T110 T111 T112	FE PE PE
SS-1	4000 TPH	I – 1998	Scalping Screen SS-1 - Receives coal from Conveyor S10. Oversized coal is routed to the Shawnee Rotary Breaker S6. Undersized coal goes to a two-way flop gate which can transfer coal to Conveyor RCT-1 or Conveyor S3B.	FE	B  A	T50  T54 T51 T53 T110	FE  FE FE FE FE
S6	1500 TPH	I-1986	Shawnee Rotary Breaker S6 - Receives coal from Scalping Screen SS-1. Refuse is transferred to Conveyor S7. Coal exiting the Rotary Breaker is transferred to Conveyor S5.	FE	B  A	T54  T28-3, T27-5	FE  PE PE
S7 Continued under Refuse Circuit							
RCT-1	4000 TPH	I – 1998	Conveyor RCT-1 – Receives coal from Scalping Screen SS-1 and transfers it to Conveyor S5.	FE	B A	T51 T52	FE FE
S5	4000 TPH	I - 1986 M – 1998	Conveyor S5 – Receives coal from Conveyor RCT-1 and Rotary Breaker S6, and transfers it to a Stack Tube/Stockpile ST-11. Note that Conveyor S5 was lengthened and its design capacity increased to 4,000 TPH.	PE	B  A	T52 T27-5  T49	FE PE  MD
ST-11	1,106,000 Tons	I - 1986 M-1998, 2001 M-2006	Stack Tube/Stockpile ST-11 - Receives coal from Conveyor S5, truck, and SS-1 bypass chute and transfers via underground feeder to Conveyor S3 and/or via front endloader to truck.	N	B  A	T49  T120 T103 T32 T102	MD  N N FE N
S3	2,500 TPH	I - 1986	Conveyor S3 – Receives coal from underground feeder located beneath Stack Tube/Stockpile ST-11 and transfers it to Conveyor S3B.	PE	B  A	T32  T33	FE  PE
S3B	4,000 TPH	I - 1986 M – 1998	Conveyor S3B - Receives coal from Conveyor S3 and Scalping Screen SS-1 two-way flop gate, and routes it to 60" Raw Coal Belt Conveyor C24. Design capacity increased to 4,000 TPH.	PE	B  A	T33 T53  T34	PE FE  PE
C24	4,000 TPH	I - 1970 M- 1994	Conveyor C24 - Receives coal from Conveyor S3B and Rotary Breakers 13-1 and 13-2 and transfers it to Raw Coal Storage Silo A ST-3, Conveyor C31, or Conveyor C31-A.	FE	B  A	T34, T8-1, T8-2 T10-3, T10-2, T10-1	PE PE PE FE FE PE
Raw Coal to Storage and to Preparation Plant							

<u>Equipment ID Number</u>	<u>Design Capacity</u>	<u>Year Installed / Modified<sup>(2)</sup></u>	<u>Description</u>	<u>Method of Control</u> <sup>(1)</sup>	<u>Associated Transfer Points/Equipment</u>			
					<u>Location: B - Before A - After</u>	<u>ID. No.</u>	<u>Method of Control</u> <sup>(1)</sup>	
<b>Raw Coal to Storage and to Preparation Plant</b>								
ST-3	6,000 Tons	I- 1970	6,000 Ton Raw Coal Storage Silo A ST-3 - Receives coal from Conveyor C24 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B A	T10-3 T12-1	FE FE	
C31	4,000 TPH	I- 1970 M- 1994	Conveyor C31 - Receives coal from Conveyor C24 and transfers it to Raw Coal Storage Silo ST-4.	FE	B A	T10-2 T10-4	FE FE	
ST-4	6,000 Tons	I- 1970	Raw Coal Storage Silo B ST-4 - Receives coal from Conveyor C31 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B A	T10-4 T12-2	FE FE	
C31-A	4,000 TPH	I- 1981	Conveyor C31-A - Receives coal from Conveyor C24 and transfers coal to Stack Tube/Raw Coal Storage Stockpile ST-2.	PE	B A	T10-1 T11	PE MC	
ST-2	77,000 Tons	I- 1981 M- 2001	Raw Coal Storage Stockpile ST-2 - Receives coal from Conveyor C31-A and truck dump and transfers it via front-endloader to Feeder C36, Storage Pit ST-10, trucks, and/or railcar.	N	B A	T11 T101 T100, T77 T113	MD MD MD MD, PE MD	
C36	500 TPH	I- 1981	Feeder C36 - Receives coal from Raw Coal Storage Stockpile ST-2 and transfers it to the 48" Raw Coal Belt Conveyor C37.	PE	B A	T77 T12-3	PE FE	
C37	1,500 TPH	I- 1970	48" Raw Coal Belt Conveyor C37 - Receives coal from the 48" Reciprocating Feeders from Raw Coal Storage Silos A and B (ST-3 and ST-4) and Feeder C36, and transfers it to Conveyor C45.	FE	B A	T12-1, T12-2, T12-3 T13	FE FE FE FE	
C45	1,500 TPH	I- 1970	Conveyor C45 - Receives coal from Conveyor C37 and transfers it into the preparation plant.	PE	B A	T13 -----	FE -----	
<b>Refuse Circuit</b>								
<u>Equipment ID Number</u>	<u>Design Capacity</u>	<u>Year Installed / Modified<sup>(2)</sup></u>	<u>Description</u>	<u>Method of Control</u> <sup>(1)</sup>	<u>Associated Transfer Points/Equipment</u>			
					<u>Location: B - Before A - After</u>	<u>ID. No.</u>	<u>Method of Control</u> <sup>(1)</sup>	
<b>Refuse Circuit</b>								
8A	400 TPH	I – 1992	Conveyor 8A - Receives refuse from Rotary Breakers 13-1 and 13-2. Refuse is transferred to Conveyor C8.	N	B A	T9-1a T9-1b T46-2	PE PE FE	
C8	Continued below under C8							
S7	800 TPH	I – 1986	Conveyor S7 - Receives refuse from the Rotary Breaker S6 and transfers it to the 80 ton Rock Bin.	PE	B A	T28-3 T29	PE PE	
Rock Bin	80 Ton	I – 1970	Rock Bin - Receives refuse from Conveyor S7 and transfers it to a 72” Reciprocating Feeder.	FE	B A	T29 -----	PE -----	
Rock Crusher #6	280 TPH	I- 1970	Rock Crusher #6 - Receives refuse from Rock Bin and transfers it to 36" Rock Belt Conveyor C8.	FE	B A	T34-2a T35	FE FE	

C8	400 TPH	I - 1970	36" Rock Belt Conveyor C8 - Receives refuse from Rock Bin #6, Rock Crusher #6, and Conveyor 8A. Transfers refuse to the 400 ton Refuse Bin ST-7.	PE	B A	T34-2b, T35, T46-2 T36	FE FE FE FE
C125	463 TPH	I - 1970	36" Plant Refuse Belt Conveyor C125 - Transfers refuse from the Preparation Plant's Washing Circuit to the 400 ton Refuse Bin ST-7.	PE	B A	----- T37	----- FE
ST-7	400 Ton	I - 1970	400 Ton Refuse Bin ST-7 - Receives coal refuse from 36" Rock Belt Conveyor C8 and 36" Plant Refuse Belt Conveyor C125 and transfers it to feeder 127 and then to Refuse Belt Conveyor C128-1 or the Emergency Refuse Stockpile.	FE	B A	T36 T37 -----	FE FE -----
C128-1	400 TPH	I - 1970	Conveyor - Receives refuse from Refuse Bin ST-7 and transfers it to Point "A" Storage Bin ST-8.	PE	B A	T38 T39	FE FE
ST-8	85 Tons	I - 1970	Point "A" Storage Bin ST-8 - Receives refuse from Conveyor C128-1 and transfers it to Belt Conveyor C128-2.	FE	B A	T39 -----	FE -----
C128-2	400 TPH	I - 1970	Conveyor C128-2 - Receives refuse from Storage Bin ST-8 and transfers it to Conveyor C128-3.	PE	B A	T40 T41	PE PE
C128-3	400 TPH	I - 1983	Conveyor C128-3 - Receives refuse from Conveyor C128-2 and transfers it to Conveyor C128-4.	N	B A	T41 T42	PE PE
C128-4	400 TPH	I - 1983	Conveyor C128-4 - Receives refuse from Conveyor C128-3 and transfers it to Conveyor C128-5.	N	B A	T42 T43	PE PE
C128-5	400 TPH	I - 2001	Conveyor C128-5 - Receives refuse from Conveyor C128-4 and transfers it to Conveyor C128-6.	N	B A	T43 T44	PE PE
C128-6	400 TPH	I-2006	Conveyor C128-6 - Receives refuse from Conveyor C128-5 and transfers it to Stacking Belt Conveyor.	PE	B A	T44 T121	PE PE
Stacking Belt Conveyor	400 TPH	I - 1970	Stacking Belt Conveyor - Receives refuse from Conveyor C128-6 and transfers it to the Refuse Stockpile ST-12.	PE	B A	T121 T45	PE MC
ST-12	26,000 Tons	I - 1970	Refuse Stockpile ST-12 - Receives refuse from Stacking Belt Conveyor and dozers move to permanent storage.	N	B A	T45 -----	MC -----

### **Rotary Breakers (13-1 & 13-2) Bypass**

<u>Equipment ID Number</u>	<u>Design Capacity</u>	<u>Year Installed / Modified</u> (2)	<u>Description</u>	<u>Method of Control</u> (1)	<u>Associated Transfer Points/Equipment</u>		
					<u>Location:</u> <u>B - Before</u> <u>A - After</u>	<u>ID. No.</u>	<u>Method of Control</u> (1)

### **Rotary Breakers (13-1 & 13-2) Bypass**

Raw Coal Auger Sampler	N/A	I - 1998	Raw Coal Auger Sampler - Samples coal from dump trucks at the truck scales. Emissions are expected to be minimal.	N	B A	----- -----	----- -----
ST-10	50 Tons	I - 1979 M - 2001	Raw Coal Storage Pit ST-10 - Receives coal from dump trucks and front-endloader and transfers it to Conveyor C11-4.	PE	B A	T4-8 T105 T4-9	MC MC PE

C11-4 Continued Under Rotary Breakers ( 13-1 & 13-2 ) Circuit

RC-1 Continued under Clean Coal Circuit

### **Clean Coal Circuit**

TD1	800 TPH	I - 1970 M- 1996	McNally Fluidized bed Thermal Dryer with two cyclones and two venturi scrubbers.	CY,SC, ME	B A	----- 001-2 A,B	----- CY,SC, ME
-----	---------	---------------------	--	--------------	--------	-----------------------	-----------------------

C100	800 TPH	I - 1970	42" Dryer Feed Belt Conveyor C100 - Transfers wet coal from Preparation to Thermal Dryer, which dries it and transfers to Horizontal Axis Mixer No. 120.	PE	B A	----- T15	----- PE
C118	800 TPH	I - 1970 M-1995	54" Coarse Clean Coal Belt Conveyor - Receives coarse clean coal from inside Preparation Plant and transfers it to Horizontal Axis Mixer No. 120.	PE	B A	T48 T16	PE FE, SC
Horizontal Axis Mixer No. 120	320 TPH	I - 1970	Horizontal Axis Mixer No. 120. Receives coarse clean coal from Conveyor C118 and clean coal from Thermal Dryer, and transfers coal to 72" Clean Coal Transfer Belt Conveyor C119.	FE	B A	T16 T17	FE, SC FE, SC
C119	1,000 TPH	I - 1970	72" Clean Coal Transfer Belt Conveyor C119 - Receives coal from the Horizontal Axis Mixer No. 120 and transfers coal to 48" Clean Coal Belt Conveyor C132.	FE	B A	T17 T18	FE, SC FE, SC
C132	1,000 TPH	I - 1970	48" Clean Coal Belt Conveyor C132 - Receives coal from the 72" Clean Coal Transfer Belt Conveyor C119 and transfers it to the 10,000 Ton Clean Storage Silo ST-5 and/or Conveyor SC-1.	FE	B A	T18 T19, T19A	FE, SC FE FE
ST-5	10,000 Ton	I - 1970	Storage 4 - 10,000 Ton Clean Coal Storage Silo ST-5. Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfers it through one mass flow feeder and six 48" reciprocating feeders to a 72" Collecting Belt Conveyor C139.	FE	B A	T19 T20	FE FE, SC
C139	5,000 TPH	I - 1970 M - 1998	72" Collecting Belt Conveyor C139 - Receives coal from Storage 4 (ST-5) through one mass flow feeder and six 48" reciprocating feeders. Transfers coal to the 72" Belt Conveyor to Sampling Tower C141. Design capacity increased to 5,000 TPH.	FE	B A	T20 T21	FE, SC FE
C141	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor C141 - Receives coal from 72" Collecting Belt Conveyor C139 and Conveyor RC-1, and transfers it to the 72" Belt Conveyor C152. Design capacity increased to 5,000 TPH. A small portion of coal from Conveyor C141 is transferred to and from the Clean Coal Sampler System.	FE	B A	T21, T23 T24	FE FE FE
<u>Equipment ID Number</u>	<u>Design Capacity</u>	<u>Year Installed / Modified<sup>(2)</sup></u>	<u>Description</u>	<u>Method of Control<sup>(1)</sup></u>	<u>Associated Transfer Points/Equipment</u>		
					<u>Location: B - Before A - After</u>	<u>ID. No.</u>	<u>Method of Control<sup>(1)</sup></u>
Clean Coal Sampler System (F01 & F02)	N/A	I - 1970 M - 1998	Clean Coal Sampler System - Receives coal from 72" Belt Conveyor C141 via Primary Sample Belt Conveyor and transfers it to the Primary Sample Crusher and the Nuclear Analyzer and subsequently back to conveyor C141.	FE	B A	----- -----	----- -----
C152	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor to Loading Bin C152 - Receives coal from 72" Belt Conveyor C141 and transfers it to the 200 Ton Loading Bin ST-6. Design capacity increased to 5,000 TPH.	FE	B A	T24 T25	FE FE
ST-6	200 Ton	I - 1970 M - 2001 M - 2004	200 Ton Loading Bin ST-6 - Receives coal from the 72" Belt Conveyor C152 and transfer it to railroad cars.	FE	B A	T25 T26	FE FE, DSS
SC-1	1,000 TPH	I - 1991	Belt Conveyor SC-1 - Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfer it to the Stack Tube/Clean Coal Storage Stockpile ST-13.	PE	B A	T19A T19B	FE MC

ST-13	514,000 Tons	I - 1991 M – 1998 M – 2002	Stack Tube/Clean Coal Storage Stockpile ST-13 - Receives clean coal from Conveyor SC-1 and transfers it using six vibrating feeders to Belt Conveyor RC-1 and/or via front end loader to trucks. Up to 360,000 TPY combined may be trucked to and from ST-13.	N	B  A	T19B T114  T22 T115	MC N  FE N
RC-1	4,000 TPH	I – 1991 M – 1998	Belt Conveyor RC-1 - Receives coal from six vibrating feeders located underneath the Clean Coal Storage Stockpile ST-13 and also from Belt Conveyor RC-4, and transfers it to the 72" Belt Conveyor RC-5.	PE	B  A	T22 T81 T23	FE PE FE
Trucked Coal and Coal Fines Circuit							
ST-16 (ST-16E)		I - 2002 A - 2008	Coal & Pond Fines Open Stockpile ST-16 – Receives coal and pond fines by truck and transfers it via front-end loader to Dump Hopper DHRC-4; via underground feeders to conveyor C120; and/or via front-end loader to truck.	N	B  A	T122 T134 T124 T135 T126	N N PE MD FE
DHRC-4 (DHRC-4E)		N	Dump Hopper DHRC-4 – Receives coal and/or pond fines by front-end loader and transfers it to Conveyor C120.	PE	B A	T124 T125	MD MD
C120 (C120E)	1,150 TPH	I - 2002 A - 2008	Conveyor C120 – Receives coal and/or pond fines from Stockpile ST-16’s underground feeders and/or Dump Hopper DHRC-4 and transfers it to Conveyor C121 or Conveyor RC-5.	PE	B  A	T125 T126 T127A T127B	MD FE PE PE
C121 (C121E)	5 TPH	I - 2002 A - 2008	Conveyor C121 – Receives coal and/or pond fines from Conveyor C120 and transfers it to Conveyor C122 and Sample Collector.	PE	B A	T127A T128	PE PE
C122 (C122E)	5 TPH	I – 2002 A – 2008	Conveyor C122 – Receives coal and/or pond fines from Conveyor C121 and transfers it to Conveyor RC5.	PE	B A	T129 T130	PE PE
RC-5 (RC-5E)	4000 TPH	I - 1998 M - 1999 M - 2001	Belt Conveyor RC-5 – Receives coal and/or coal fines from Conveyor C120 and C122 and transfers to Conveyor RC-1 (see Clean Coal Circuit).	N	B  A	T125 T127B T130 T81	PE PE PE PE
Roadways							
<u>Equipment ID Number</u>	<u>Design Capacity</u>	<u>Year Installed / Modified<sup>(2)</sup></u>	<u>Description</u>	<u>Method of Control<sup>(1)</sup></u>	<u>Associated Transfer Points/Equipment</u>		
					<u>Location: B - Before A - After</u>	<u>ID. No.</u>	<u>Method of Control<sup>(1)</sup></u>
Roadways							
PRP	N/A	I - 1970 M- 2001	Paved Roadways and parking lots.	RWMW	N/A	N/A	N/A
URP	N/A	I - 1970 M- 2001	Unpaved Roadways and parking lots	RWMW	N/A	N/A	N/A

- (1) Method of Control abbreviations: FE - Full Enclosure, PE - Partial Enclosure, MD - Minimization of Material Drop Height, N - None, MC - Moisture Control, DSS - Dust suppressant Spray, CY - Cyclones, SC - Scrubbers, ME - Mist Eliminator, RWMW - Water Truck with Manufactured Pressurized sprays
- (2) I - Year Installed, M- Year Modified, A-Year Added , N-Not installed yet

## 1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such

permit(s) is listed below.

Permit Number	Date of Issuance
R13-2183K	April 28, 2008



## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source Performance
<b>CBI</b>	Confidential Business Information		Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations		
<b>CO</b>	Carbon Monoxide	<b>pph</b>	Pounds per Hour
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>ppm</b>	Parts per Million
<b>DAQ</b>	Division of Air Quality	<b>PSD</b>	Prevention of Significant Deterioration
<b>DEP</b>	Department of Environmental Protection	<b>psi</b>	Pounds per Square Inch
<b>FOIA</b>	Freedom of Information Act	<b>SIC</b>	Standard Industrial Classification
<b>HAP</b>	Hazardous Air Pollutant		
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>m</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>mm</b>	Million	<b>USEPA</b>	United States Environmental Protection Agency
<b>mmBtu/hr</b>	Million British Thermal Units per Hour	<b>UTM</b>	Universal Transverse Mercator
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards	<b>VOC</b>	Volatile Organic Compounds
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
  - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.
- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39 40]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

## **2.16. Need to Halt or Reduce Activity not a Defense**

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

## **2.17. Emergency**

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**[45CSR§30-5.7.c.]**

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

**[45CSR§30-5.7.d.]**

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**[45CSR§305.7.e.]**

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

**[45CSR§30-5.2.a.]**

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**[45CSR§30-5.1.f.5.]**

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**[45CSR§30-4.2.]**

## **2.21. Permit Shield**

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§305.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§305.1.e.]**

## **2.24. Property Rights**

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**



- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
  - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
  - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.  
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

**[40 C.F.R. 68]**

- 3.1.9. Fugitive dust control methods, such as full enclosures, partial enclosures, and water sprays, proposed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments or supplements thereto shall be installed, operated, and maintained in such a manner so as to minimize the generation and atmospheric entrainment of fugitive particulate emissions. A freeze protection plan shall be incorporated to insure that the wet suppression systems remain operational at all times. In accordance with the information filed, the methods of control given in the Equipment Table in Section 1.0. of this permit shall be installed, maintained, and operated so as to minimize the emission of PM (particulate matter) and PM<sub>10</sub> (particulate matter less than ten microns in diameter).

**[45CSR13, R13-2183, A.10.]**

- 3.1.10. The permittee shall maintain a water truck on site and in good operating condition, and shall utilize same to apply water, or a mixture of water and an environmentally acceptable dust control additive, hereinafter referred to as solution, as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used.

The spraybar shall be equipped with commercially available spray nozzles, of sufficient size and number, so as to provide adequate coverage to the surface being treated.

The pump delivering the water, or solution shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water, or solution, and at a sufficient pressure.

**[45CSR13, R13-2183, A.11.]**

- 3.1.11. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any fugitive dust control system, coal processing and conveying equipment, coal storage system, or coal transfer and loading system which is twenty percent (20%) opacity or greater. These opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. Note that the regulatory citations 40 C.F.R. §§ 60.254(a), 60.11(c), and 45CSR16 (below) apply only to the 40 C.F.R. 60 Subpart Y affected facilities, which are those listed in Section 5.0. of this permit.

**[45CSR13, R13-2183, B.2. & B.4; 45CSR§5-3.4.; 40 C.F.R. §60.254(a); 40 C.F.R. §60.11(c); 45CSR16]**

- 3.1.12. No person shall cause, suffer, allow or permit a coal preparation plant or handling operation to operate that is not equipped with a fugitive dust control system. This system shall be operated and maintained in such a manner as to minimize the emission of particulate matter into the open air.

**[45CSR13, R13-2183, B.2., and 45CSR§5-6.1.]**

- 3.1.13. The owner or operator of a coal preparation plant or handling operation shall maintain dust control of the premises and owned, leased, or controlled access roads by paving, or other suitable measures. Good operating practices shall be observed in relation to stockpiling, car loading, breaking, screening, and general maintenance to minimize dust generation and atmospheric entrainment.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-6.2.]**
- 3.1.14. The permitted facility shall be constructed and operated in accordance with information filed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments thereto.  
**[45CSR13, R13-2183, A.1.]**

### **3.2. Monitoring Requirements**

- 3.2.1. The permittee shall conduct monitoring/recordkeeping/reporting as follows: [Not required for stockpiles and haulroads – OS1, ST-14, ST-2, ST-11, ST-12, ST-13, ST-16, PRP, URP] To determine compliance with the opacity limit of permit condition 3.1.11., the permittee shall conduct weekly visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for all coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed. Records of all observations shall be maintained in accordance with permit condition 3.4.4.  
**[45CSR§30-5.1.c.]**
- 3.2.2. The permittee shall inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.  
**[45CSR§30-5.1.c.]**
- 3.2.3. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.  
**[45CSR§30-5.1.c.]**

### **3.3. Testing Requirements**

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment,

such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language.
  2. The result of the test for each permit or rule condition.
  3. A statement of compliance or non-compliance with each permit or rule condition.

**[WV Code §§ 2254(a)(14-15) and 45CSR13]**

- 3.3.2. Any stack venting thermal dryer exhaust gases and/or air table exhaust gases or exhaust gases or air from any air pollution control device shall include straight runs of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. Flow straightening devices shall be required where cyclonic gas flow would exist in the absence of such devices.  
**[45CSR13, R13-2183, B.2., 45CSR§5-12.6.]**
- 3.3.3. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, the owner or operator of such facility shall conduct performance test(s) to determine compliance with emission limitations set forth in 40 C.F.R. §60.254(a) and furnish a written report of the results of such performance test(s).

[40 C.F.R. §60.8(a), 45CSR16, and 45CSR13, R13-2183, B.4.] [DHRC-4, C120, C121 and C122]

### 3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.4.4. A record of each visible emissions observation required by permit condition 3.2.1. shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

### 3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[45CSR§§30-4.4. and 5.1.c.3.D.]**

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

**[45CSR§30-5.1.c.3.E.]**

- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**

**US EPA:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV  
25304

~~Section Chief~~ [Associate Director](#)  
~~Office of Air Enforcement and Compliance Assistance~~  
~~(3AP20)~~  
U. S. Environmental Protection Agency, Region III  
[Enforcement and Compliance Assurance Division](#)  
[Air Section \(3ED21\)](#)  
1650 Arch Street  
Philadelphia, PA 19103-2029

**DAQ Compliance and Enforcement<sup>1</sup>:**

DEPAirQualityReports@wv.gov

<sup>1</sup>For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

**[45CSR§30-8.]**

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

**DAQ:**

DEPAirQualityReports@wv.gov

**US EPA:**

R3\_APD\_Permits@epa.gov

**[45CSR§30-5.3.e.]**



- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

**DAQ:**

DEPAirQualityReports@wv.gov

**[45CSR§30-5.1.c.3.A.]**

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
  2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
  3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
  4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

**[45CSR§30-5.1.c.3.C.]**

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

**[45CSR§30-5.1.c.3.B.]**

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

**[45CSR§30-4.3.h.1.B.]**



### 3.6. Compliance Plan

- 3.6.1. There is no compliance plan since the permittee certified compliance with all applicable requirements in the renewal application.

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- 3.7.3.

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the <del>third</del> <u>fourth</u> permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the <del>second-third</del> renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-02A, 001-02B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee's calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control "major source". Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p>

	<p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p>
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#### 4.0 Thermal Dryer [emission point ID(s): TD1]

##### 4.1. Limitations and Standards

4.1.1. The thermal dryer shall not be operated more than 7,083 hours per year. The permittee shall maintain records showing the number of hours each calendar day the thermal dryer was in operation.

[45CSR13, R13-2183, A.2.]

4.1.2. Emissions from the thermal dryer shall not exceed the following hourly and annual limits:

Pollutant	Emissions Limitations	
	One-Hour Average (lb/hour)	Annual (ton/year)
Volatile Organic Compounds (VOCs)	41.3	146
SO <sub>2</sub>	50.3	178
NO <sub>x</sub>	93.9	332
CO	50.3	178
Particulate Matter (PM)	77.0	272

[45CSR13, R13-2183, A.4.]

4.1.3. Scrubber water flow shall be maintained at a minimum of 2,240 gpm. The scrubber water system shall receive clean water from the clarifier water sump and shall discharge dirty water to the clarifier centerwell for solids removal. Pressure drop across the scrubber shall be adjusted as required to control particulate matter emissions. Alkaline agents may be added to the scrubber water to control sulfur dioxide emissions.

[45CSR13, R13-2183, A.5.]

4.1.4. No person shall cause, suffer, allow, or permit the emission into open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 ppmv by volume from existing source operations.

[45CSR13, R13-2183, B.3., and 45CSR§10-4.1.]

4.1.5. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any stack which is twenty percent (20%) opacity or greater, except as noted in 45CSR§5-3.2.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.1.]

4.1.6. The provisions of permit condition 4.1.5. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period or periods aggregating no more than five (5) minutes in any sixty (60) minute period during operation.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.2.]

4.1.7. The provisions permit conditions 4.1.5. and 4.1.6. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period of up to eight (8) minutes in any operating day for the purposes of building a fire of operating quality in the fuel burning equipment of a thermal dryer.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.3.]

- 4.1.8. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from the thermal dryer exhaust in excess of 0.083 grains per standard cubic foot.  
[45CSR13, R13-2183, B.2., 45CSR§5-4.1.b., and 45CSR5 Appendix 1.2.]
- 4.1.9. No person shall circumvent 45CSR§5-4.1.b. (permit condition 4.1.8) by adding additional gas to any dryer exhaust or group of dryer exhaust for the purpose of reducing the grain loading.  
[45CSR13, R13-2183, B.2., and 45CSR§5-4.2.]
- 4.1.10. No person shall cause, suffer, allow or permit the exhaust gases from a thermal dryer to be vented into the open air at an altitude of less than eighty (80) feet above the foundation grade of the structure containing the dryer or less than ten (10) feet above the top of the said structure or any adjacent structure, whichever is greater. In determining the desirable height of a plant stack, due consideration shall be given to the local topography, meteorology, the location of nearby dwellings and public roads, the stack emission rate, and good engineering practice as set forth in 45CSR20.  
[45CSR13, R13-2183, B.2., and 45CSR§5-4.3.]

## 4.2. Monitoring Requirements

Note: For purposes of complying with 40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM), the words “indicator” or “indicators” shall mean the specific parameters to be monitored, measured, polled, or sampled (as applicable). Operation of the equipment while each indicator is within the acceptable range (defined below for each indicator) will provide a reasonable assurance of compliance with applicable emission limitations or standards for the anticipated range of operations of the equipment.

- 4.2.1. **Thermal Dryer Exhaust Temperature** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the temperature of the gas stream at the exit of the thermal dryer between the dryer exhaust fan and the venturi scrubbers. An excursion shall be defined as a 1-hour average temperature outside of the acceptable thermal dryer exhaust temperature defined as 170°F to 240°F. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus three degrees Fahrenheit ( $\pm 3$  °F) and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 1 of 3 for particulate matter control under the 40 C.F.R. 64 plan.  
[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.1. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]

- 4.2.2. **Scrubber Water Supply Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the water supply pressure to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber water supply pressure defined as 7-psig. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus five percent ( $\pm 5\%$ ) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 2 of 3 for particulate matter control, and also Indicator 1 of 3 for sulfur dioxide control, under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.b. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]**
- 4.2.3. **Scrubber Inlet Static Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss through the scrubber. The pressure drop will be measured at the inlet to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber inlet static pressure defined as 18 inches of water column. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus one inch ( $\pm 1$  in.) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 3 of 3 for particulate matter control under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.a. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]**
- 4.2.4. **Dryer Fuel Coal Sulfur Content** – The permittee shall sample in accordance with approved ASTM methods on at least a daily basis the fuel coal burned in the furnaces and have the samples analyzed for sulfur and BTU content. The analysis results shall be accurate within  $\pm 0.1$  weight percent. Result of these analyses shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. If the sulfur content exceeds 1.09 percent on a dry basis, the permittee shall add sodium hydroxide solution in accordance with permit condition 4.2.5. to the scrubber water and/or to the coal being dried to reduce sulfur dioxide emissions. Compliance with the more stringent limit (1.09 weight percent before adding NaOH) proposed by the permittee, and enforceable under 45CSR§30-12.7., ensures compliance with the 1.22 weight percent threshold prior to NaOH addition set forth by R13-2183, A.3. An excursion shall be defined as exceeding the 1.09 weight percent limit without addition of sodium hydroxide in accordance with permit condition 4.2.5. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). This permit condition accounts for Indicator 2 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.; 45CSR§10-8.2.c.]**

- 4.2.5. **Sodium Hydroxide (NaOH) Addition Rate** – The metering pump shall be used to add 0.51 gallons per minute of 20% sodium hydroxide solution to the scrubber water and/or to the coal being dried based upon sulfur content determined under permit condition 4.2.4. The metering pump used to add NaOH solution shall be calibrated monthly during NaOH addition by measuring the time to deliver a specified volume of the solution. The minimum accuracy of the metering pump shall be  $\pm 0.1$  gallons per minute. The monitoring system shall continually sense the indicator (NaOH addition rate), poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This permit condition accounts for Indicator 3 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan.  
[45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.]
- 4.2.6. To determine compliance with the opacity limits of permit condition 4.1.5., the permittee shall conduct daily visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for the thermal dryer. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.  
[45CSR§30-5.1.c.]
- 4.2.7. The thermal dryer unit(s) included in this permit shall be observed visually during periods of building a fire of operating quality and minimization efforts taken to ensure particulate matter emissions of sixty percent (60 %) opacity for a period of up to 8 minutes in any operating day is not exceeded during such activities.  
[45CSR§30-5.1.c.]
- 4.2.8. **Proper maintenance.** At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
[40 C.F.R. § 64.7(b); 45CSR§30-5.1.c.]
- 4.2.9. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 C.F.R. 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.  
[40 C.F.R. § 64.7(c); 45CSR§30-5.1.c.]

#### 4.2.10. **Response to Excursions or Exceedances**

(1) Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 C.F.R. § 64.7(d); 45CSR§30-5.1.c.]

- 4.2.11. **Documentation of need for improved monitoring.** After approval of monitoring under 40 C.F.R. 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 C.F.R. § 64.7(e); 45CSR§30-5.1.c.]

- 4.2.12. The permittee shall maintain daily records of the coal throughput of the thermal dryer and record the rolling yearly total of coal. A rolling yearly total shall mean the sum of coal throughput at any given time for the previous twelve (12) months.

[45CSR§30-5.1.c.]

### 4.3. **Testing Requirements**

- 4.3.1. At such reasonable times as the Secretary may designate, the owner or operator of a source(s) of any fuel burning unit(s) manufacturing process source(s) or combustion source(s) may be required to conduct or have conducted tests to determine the compliance of such source(s) with the emission limitations of section 3, 4 or 5 of 45CSR10. Such tests shall be conducted in accordance with the appropriate test methods 40 C.F.R. 60, Appendix A, Method 6, Method 15 or other equivalent EPA testing method approved by the Secretary. The Secretary, or his or her duly authorized representative, may at his or her option witness or conduct such tests. Should the Secretary exercise his or her option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports to be located in such a manner as the



Secretary may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.a.]**

- 4.3.2. The Secretary, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§10-3.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.b.]**

- 4.3.3. At the request of the Secretary the owner and/or operator of a source shall install such stack gas monitoring devices as the Secretary deems necessary to determine compliance with the provisions of 45CSR§10-4.1. The data from such devices shall be readily available at the source location or such other reasonable location that the Secretary may specify. At the request of the Secretary, or his or her duly authorized representative, such data shall be made available for inspection or copying. Failure to promptly provide such data shall constitute a violation of 45CSR10.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.a.]**

- 4.3.4. Prior to the installation of calibrated stack gas monitoring devices, sulfur dioxide emission rates shall be calculated on an equivalent fuel sulfur content basis.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.b.]**

- 4.3.5. The permittee ~~shall~~ was required to conduct particulate matter stack testing no later than September 26, 2017, ~~and shall~~ to establish and/or verify existing parameter indicator ranges. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

The Director shall be furnished with a written report of the results of such testing and established indicator ranges. The permittee shall use Method 5 or an alternative method approved by the Director for such testing. Parameter indicator ranges shall be re-established or verified for the exhaust temperature of the thermal dryer, water pressure to the scrubber, and the scrubber inlet static pressure. The permittee shall re-establish and/or verify these indicator ranges and operate within these ranges to provide a reasonable assurance that the thermal dryer unit is in compliance with opacity and particulate loading limits. The permittee shall take immediate corrective action when a parameter falls outside the indicator range established for that parameter and shall record the cause and corrective measures taken. The permittee shall also record the following parameters during such testing:

- a. Opacity readings on the exhaust stack following the procedures of Method 9;
- b. Amount of coal burned and the amount of coal dried;
- c. Coal drying temperature and residence time in the dryer;
- d. Temperature of the gas stream at the exit of the thermal dryer;
- e. Flow rate through the dryer and converted to dry standard cubic feet;
- f. Water pressure to the control equipment; and
- g. Scrubber inlet static pressure. The static pressure at the inlet of the scrubber will be measured.

Subsequent testing to determine compliance with the particulate loading limitations permit condition 4.1.8. shall be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Initial	$\leq 50\%$ of particulate loading limit	Once/5 years
Initial	between 50% and 90 % of particulate loading limit	Once/3 years
Initial	$\geq 90\%$ of particulate loading limit	Annual
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual

*Note: Previous testing was performed in 2012. Based upon those results, testing was not required again until 2017.*

[45CSR§30-5.1.c.]

#### 4.4. Recordkeeping Requirements

- 4.4.1. A record of each visible emissions observation shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the daily inspections, and the times the thermal dryer air pollution control system is inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 4.4.2. All thermal dryer scrubber malfunctions must be documented in writing. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. At a minimum, the following information must be documented for each malfunction:

- Cause of malfunction
- Steps taken to:

- i. correct the malfunction
  - ii. minimize emissions during malfunction
- c. Duration of malfunction in hours
- d. Estimated increase in emissions during the malfunction
- e. Any change/modifications to equipment or procedures that would help prevent future recurrence of malfunction.

**[45CSR13, R13-2183, B.1.]**

#### **4.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- (2) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**[40 C.F.R. §64.9(b); 45CSR§30-5.1.c.]**

### **4.5. Reporting Requirements**

#### **4.5.1. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.
- (2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:
  - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - (iii) A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

**[40 C.F.R. §64.9(a); 45CSR§30-5.1.c.]**

#### **4.6. Compliance Plan**

4.6.1. N/A

**5.0 Transfer Points Subject to 40 C.F.R. 60, Subpart Y [emission point ID(s): Truck Dumping [at ST-10 (T4-8) and DH-3 (T93)]; Endloader [at OS-1 (T92), ST-2 (T77, T100 and T113), ST-10 (T105 and T4-9), ST-11 (T102), ST-13 (T119), ST-14 (T104), ST-16 (T135), DH-3 (T94, T95), DHRC-4 (T124, T125)]; Rail Car Loading Bin ST-6 (T25 and T26); Mine Car Dump MCD-1 (T72A and T72B); Conveyors: C24 (T10-1, T10-2 and T10-3), C31 (T10-4), C31A (T11), C36 Feeder (T12-3), C118 (T16), C132 (T19, T19A), SC-1 (T19B), ST-5 Reclaim System (T20), C139 (T21), ST-13 Reclaim System (T22), RC-1 (T23), C141 (T24), C152 (T25), ST-6 Reclaim System (T26), S3A (T111 and T112), S7 (T29), ST-11 Reclaim System (T32), S3 (T33), S3B (T34), C128-3 (T42), C128-4 (T43), 8A (T46-2), S5 (T49), S10 (T50), RCT-1 (T52), C11-4 (T73, T74), RC-5 (T81), C10-3 (T96), C128-5 (T44), C128-6 (T121), C120 (T127A, T127B), C121 (T128, T129), C122 (T130); Breaker: S6 (T54, T27-5, and T28-3); Screen: SS-1 (T50, T51, T53, and T54)]**

## 5.1. Limitations and Standards

5.1.1. In accordance with the information filed, the following processing limits shall not be exceeded:

Type of Material and Location Where Processed	Maximum Amount to be Processed (TPY)
Raw coal feed from No. 50 Mine to Scalping Screen (SS-1)	6,900,000
Raw coal feed to Wet Wash Circuit/Preparation Plant (1,500 ton/hr * 7,083 hr/yr)	10,630,000
Feed coal from Wash Circuit to Thermal Dryer (800 ton/hr * 7,083 hr/yr)	5,670,000
Trucked Coal and/or Coal Fines from Conveyor RC-5 to Conveyor RC-1.	860,000
Clean coal/Coal Fines from Loading Bin ST-6 to railroad cars	8,100,000

[45CSR13, R13-2183, A.6.]

5.1.2. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 C.F.R. §60.11(d), 45CSR16, and 45CSR13, R13-2183, B.4.]

## 5.2. Monitoring Requirements

5.2.1. Refer to permit conditions 3.2.1. and 3.2.2.

## 5.3. Testing Requirements

5.3.1. Reserved.

#### **5.4. Recordkeeping Requirements**

5.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit condition 5.1.1., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachment A. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.  
**[45CSR13, R13-2183, B.6. and A.9.]**

5.4.2. Refer to permit conditions 3.4.4.

#### **5.5. Reporting Requirements**

5.5.1. Reserved.

#### **5.6. Compliance Plan**

5.6.1. N/A

## 6.0 Coal Storage and Stockpiles [emission point ID(s): OS-1, ST-2, ST-10, ST-11, ST-13, ST-14, ST-16]

### 6.1. Limitations and Standards

- 6.1.1. In accordance with the information filed, the following storage and truck delivery limits shall not be exceeded:

Stockpile/Bin ID No.	Material Stored	Maximum in Storage (tons)	Maximum to be Delivered (TPY) <sup>1</sup>
Stockpile OS-1	raw coal	631,000	250,000
Stockpile ST-2	raw coal	77,000	180,000
Storage Pit ST-10	raw coal	≈ 50	550,000 <sup>2, 3, 6</sup>
Stockpile ST-11	raw coal	1,106,000	100,000 <sup>4</sup>
Stockpile ST-13	clean coal	514,000	360,000 <sup>5</sup>
Stockpile ST-14	raw coal	54,000	750,000 to 1,000,000 <sup>6</sup>
Stockpile ST-16	coal	120,000	360,000 <sup>7</sup>
	coal fines	Combined	500,000 <sup>8</sup>

- (1) Maximum quantity of coal to be delivered via trucks by other suppliers from outside sources.  
(2) Less the amount delivered directly to Stockpile ST-2.  
(3) 0 TPY up to 250,000 TPY of the 550,000 TPY will pass over the truck scale near the refuse road.  
(4) Less the amount transferred from other stockpiles.  
(5) Up to 360,000 TPY combined may be received at or shipped from ST-13 by truck.  
(6) The sum of coal trucked to Storage Pit ST-10 via the truck scale and the coal trucked to Stockpile ST-14 shall not exceed 1.0 million TPY.  
(7) Up to 360,000 TPY of coal may be received at or shipped from ST-16 by truck.  
(8) Up to 500,000 TPY of coal fines may be received at ST-16 by truck.

### [45CSR13, R13-2183, A.7.]

- 6.1.2. In accordance with the information filed, the following transfer limits between coal storage areas shall not be exceeded:

Originating Stockpile ID No.	Maximum Amount to be Transferred to Stockpiles Listed Below (TPY) <sup>1</sup>						
	OS-1	ST-2	ST-10	ST-11	ST-13	ST-14	ST-16
OS-1	-----	100,000	350,000	100,000	100,000	100,000	100,000
ST-2	100,000	-----	280,000 <sup>3</sup>	100,000	100,000	100,000	100,000
ST-10	0	0	-----	0	0	0	0
ST-11	100,000	100,000	100,000	-----	100,000	100,000	100,000
ST-13	100,000	100,000	100,000	100,000	-----	100,000	100,000
ST-14	100,000	100,000	100,000	100,000	100,000	-----	100,000
ST-16	100,000	100,000	100,000	100,000	100,000	100,000	-----
<b>All Areas<sup>2</sup></b>	100,000	100,000	530,000	100,000	100,000	100,000	100,000

- (1) The quantities to be received for any single storage area are not additive.  
(2) The last row summarizes the maximum amount that could be transferred to each storage area from all other storage areas.  
(3) The permittee has the option to alternatively load up to 180,000 TPY into a railcar at ST-2 in lieu of transferring it to ST-10.

[45CSR13, R13-2183, A.8.]

- 6.1.3. The permittee shall maintain and operate a vacuum truck along the paved entrance(s) to Stockpile OS-1 at all times during which truck traffic is present, either receiving or shipping coal.

[45CSR13, R13-2183, A.12.]

## **6.2. Monitoring Requirements**

- 6.2.1. Reserved.

## **6.3. Testing Requirements**

- 6.3.1. Reserved.

## **6.4. Recordkeeping Requirements**

- 6.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit conditions 6.1.1. and 6.1.2., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments B and C. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.

[45CSR13, R13-2183, B.6. and A.9.]

## **6.5. Reporting Requirements**

- 6.5.1. Reserved.

## **6.6. Compliance Plan**

- 6.6.1. N/A



## **7.0 Refuse Bin, Refuse Area, Refuse Stockpile [emission point ID(s): ST-7, ST-8, ST-12]**

### **7.1. Limitations and Standards**

- 7.1.1. In order to prevent and control air pollution from coal refuse disposal areas, the operation of coal refuse disposal areas shall be conducted in accordance with the standards established by 45CSR§5-7 (7.1.2. through 7.1.8.).  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.1.]**
- 7.1.2. Coal refuse is not to be deposited on any coal refuse disposal area unless the coal refuse is deposited in such a manner as to minimize the possibility of ignition of the coal refuse.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.2.]**
- 7.1.3. Coal refuse disposal areas shall not be so located with respect to mine openings, tipples, or other mine buildings, unprotected coal outcrops or steam lines, that these external factors will contribute to the ignition of the coal refuse on such coal refuse disposal areas.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.3.]**
- 7.1.4. Vegetation and combustible materials shall not be left on the ground at the site where a coal refuse pile is to be established, unless it is rendered inert before coal refuse is deposited on such site.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.4.]**
- 7.1.5. Coal refuse shall not be dumped or deposited on a coal refuse pile known to be burning, except for the purpose of controlling the fire or where the additional coal refuse will not tend to ignite or where such dumping will not result in statutory air pollution.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.5.]**
- 7.1.6. Materials with low ignition points used in the production or preparation of coal, including but not limited to wood, brattice cloth, waste paper, rags, oil and grease, shall not be deposited on any coal refuse disposal area or in such proximity as will reasonably contribute to the ignition of a coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.6.]**
- 7.1.7. Garbage, trash, household refuse, and like materials shall not be deposited on or near any coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.7.]**
- 7.1.8. The deliberate ignition of a coal refuse disposal area or the ignition of any materials on such an area by any person or persons is prohibited.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.8.]**

7.1.9. Each burning coal refuse disposal area which allegedly causes air pollution shall be investigated by the Secretary in accordance with the following: With respect to all burning coal refuse disposal areas, the person responsible for such coal refuse disposal areas or the land on which such coal refuse disposal areas are located shall use due diligence to control air pollution from such coal refuse disposal areas. Consistent with the declaration of policy and purpose set forth in section one of chapter twenty-two, article five of the code of West Virginia, as amended, the Secretary shall determine what constitutes due diligence with respect to each such burning coal refuse disposal area. When a study of any burning coal refuse disposal area by the Secretary establishes that air pollution exists or may be created, the person responsible for such coal refuse disposal area or the land on which such coal refuse disposal area is located shall submit to the Secretary a report setting forth satisfactory methods and procedures to eliminate, prevent, or reduce such air pollution. The report shall be submitted within such time as the Secretary shall specify. The report for the elimination, prevention or reduction of air pollution shall contain sufficient information, including completion dates, to establish that such program can be executed with due diligence. If approved by the Secretary, the corrective measures and completion dates shall be embodied in a consent order issued pursuant to W.Va. Code 22-5-1 et seq. If such report is not submitted as requested or if the Secretary determines that the methods and procedures set forth in such report are not adequate to reasonably control such air pollution, then a hearing will be held pursuant to the procedures established by W.Va. Code 22-5. [45CSR13, R13-2183, B.2., and 45CSR§§5-8.1. and 8.3.]

7.1.10. The maximum amount of refuse in storage at the Refuse Storage ST-12 shall not exceed 26,000 tons. [45CSR13, R13-2183, A.7.]

## **7.2. Monitoring Requirements**

7.2.1. Reserved.

## **7.3. Testing Requirements**

7.3.1. Reserved.

## **7.4. Recordkeeping Requirements**

7.4.1. For the purpose of determining compliance with the maximum storage limit set forth in permit condition 7.1.10., the permittee shall maintain daily records of the amount (in tons) of refuse in storage at the beginning of each day, the amounts transferred to and from ST-12 each day, and the amount of refuse in storage at the end of each day. To facilitate this recordkeeping, an example data form is provided as Attachment D. [45CSR§30-5.1.c.]

## **7.5. Reporting Requirements**

7.5.1. Reserved.

## **7.6. Compliance Plan**

7.6.1. N/A

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900006-2022**  
Application Received: **August 31, 2021**  
Plant Identification Number: **03-054-10900006**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **302 South Jefferson Street, Roanoke, VA 24011**

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Physical Location:	Pineville, Wyoming County, West Virginia
UTM Coordinates:	456.10 km Easting • 4,155.40 km Northing • Zone 17
Directions:	At Pineville, take Route 10 South approximately one mile, turn right onto Route 16 South, travel approximately one mile before turning left onto Pinnacle Creek Road and the facility will be located on the right side of the road.

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### Facility Description

The facility is a coal preparation plant which processes raw coal from an underground bituminous coal mine plus other raw coal sources. The preparation process involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, low sulfur coal product. Operations at the plant include breaking, crushing, handling, screening, washing, and drying. The facility is characterized by SIC code 1222.

## Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Carbon Monoxide (CO)	178	0.00
Nitrogen Oxides (NO <sub>x</sub> )	333	0.00
Particulate Matter (PM <sub>2.5</sub> )	168	1.61
Particulate Matter (PM <sub>10</sub> )	355	9.88
Total Particulate Matter (TSP)	744	26.44
Sulfur Dioxide (SO <sub>2</sub> )	178	0.00
Volatile Organic Compounds (VOC)	186	0.00
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Benzene	2.33	0.00
Hexane	4.66	0.00
Hydrochloric acid	8.01	0.00
Aggregate HAPs <sup>2</sup>	17.62	<del>0.0034</del> <0.01

<sup>1</sup> The 2020 actual emissions are from the State and Local Emissions Inventory System (SLEIS). Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and have not operated since 2017. The actual emissions from 2020 are from coal being trucked to the facility and then transferred to the railcar loadout for shipment.

<sup>2</sup> The actual aggregate HAPs is the sum of the specific HAPs listed in the 2020 SLEIS report.

## Title V Program Applicability Basis

This facility has the potential to emit 178 tpy of CO, 333 tpy of NO<sub>x</sub>, 355 tpy of PM<sub>10</sub>, 178 tpy of SO<sub>2</sub>, and 186 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pinnacle Mining Company, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Coal Preparation and Handling Operations
	45CSR6	Open burning prohibited.
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction/Modification
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Y	Coal Preparation Plants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2183K	April 28, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

- Title V Boiler Plate Changes.** In Section 2.11.4., the reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.  
  
In Section 2.22.1., the reference notation was changed to delete 45CSR38 because it has been repealed.  
  
In Section 3.5.3., the contact information for EPA was updated.
- Miscellaneous Revision.** In Section 3.7.3. in the third row titled 40 C.F.R. Part 64, the first sentence under Rationale was updated because this is now the fourth renewal for this facility.
- Particulate Matter Stack Testing of Thermal Dryer.** Condition 4.3.5. of the current Title V permit required PM stack testing of the thermal dryer TD1 no later than September 26, 2017. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

4. **Miscellaneous Revision.** In the Example Data Form Attachments, the Title V permit number suffix has been updated from 2017 to 2022 in Attachments A through D.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the fourth permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the <del>second</del>-third renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-02A, 001-02B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee’s calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p> <p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p>

### Request for Variances or Alternatives

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: (Date of Notice Publication)  
Ending Date: (Publication Date PLUS 30 Days)

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Daniel P. Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41902  
[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not Applicable.



Roberts, Daniel P <daniel.p.roberts@wv.gov>

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## Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal

1 message

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**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

Mon, May 23, 2022 at 8:01 AM

Carrie,

Hey. I have attached the draft/proposed fact sheet and permit for the above referenced facility. Please review them and let me know if you have any comments or questions.

I will stop by or call to talk about the proposed stack testing language that has been incorporated.

Thanks,  
Dan

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### 2 attachments

 **R30-10900006-2022 Draft Fact Sheet 5-23-22.doc**  
107K

 **R30-10900006-2022 Draft Permit 5-23-22.docx**  
324K



**West Virginia Department of Environmental Protection**

*Harold D. Ward  
Cabinet Secretary*

# Permit to Operate



Pursuant to  
**Title V**  
of the Clean Air Act

*Issued to:*  
**Pinnacle Mining Company, LLC**  
**Pinnacle Preparation Plant**  
**R30-30-10900006-2022**

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Laura M. Crowder  
Director, Division of Air Quality

*Issued: [Date of issuance] • Effective: [Equals issue date plus two weeks]  
Expiration: [5 years after issuance date] • Renewal Application Due: [6 months prior  
to expiration]*

Permit Number: **R30-10900006-2022**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **~~P.O. Box 338, Pineville, West Virginia 24874~~**  
**302 South Jefferson Street, Roanoke, VA 24011**

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*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 C Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

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Facility Location:	Pineville, Wyoming County, West Virginia
Mailing Address:	<del>P.O. Box 338, Pineville, West Virginia 24874</del> <u>302 South Jefferson Street, Roanoke, VA 24011</u>
Telephone Number:	<del>304-732-9720</del> <u>540-314-0115</u>
Type of Business Entity:	LLC
Facility Description:	The facility is a coal preparation plant which processes raw coal from an <del>associated</del> underground bituminous coal mine plus other raw coal sources. The preparation <u>process</u> involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, <del>and</del> low sulfur coal <u>product</u> . Operations at the plant include breaking, crushing, handling, screening, washing and drying.
SIC Codes:	1222
UTM Coordinates:	456.10 km Easting \$ 4,155.40 km Northing \$ Zone 17

Permit Writer: Daniel P. Roberts

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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*Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.*

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### **Source-specific Requirements**

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**ATTACHMENT A – Monthly Processing Rate Report**

**ATTACHMENT B – Monthly Delivery Rate Report from Outside Suppliers**

**ATTACHMENT C – Monthly Transfer Rate Report**

**ATTACHMENT D – Monthly Refuse Storage (ST-12) Report**

**Certification of Data Accuracy**

## 1.0 Emission Units and Active R13, R14, and R19 Permits

### 1.1 Emission Units

Equipment ID Number	Design Capacity	Year Installed / Modified <sup>(2)</sup>	Description	Method of Control <sup>(1)</sup>	Associated Transfer Points/Equipment		
					Location: B - Before A - After	ID. No.	Method of Control <sup>(1)</sup>
Storage Addition							
OS-1	631,000 Tons	I – 1998 M- 1999 M-2000,2001, 2002	Open Stockpile OS-1 - Receives coal via dump truck. A front-endloader is used to move coal from the Open Stockpile OS-1 to trucks for hauling to Stockpiles ST-2, ST-11, ST-13, ST-14, ST-16, or Storage Pit ST-10.	N	B	T65	MD
					A	T92	N
Rotary Breakers (C11-1 & C11-2) Circuit							
ST-14	54,000 Tons	I - 2001 M-2002	Raw Coal Open Stockpile ST-14 - Receives coal by truck from Stockpile OS-1 and off site suppliers and transfers it via front-endloader to Dump Hopper DH-3 and/or front endloader to truck.	N	B  A	T93  T94 T104	MC  PE MC
DH-3	45 Tons	I – 2001	Dump Hopper DH-3 - Receives coal via truck and/or front-endloader from Raw Coal Open Stockpile ST-14 and transfers it to Conveyor C10-3.	PE	B  A	T94  T95	PE  PE
C10-3	1,000 TPH	I – 2001	Conveyor C10-3 - Receives coal from Dump Hopper DH-3 and transfers it to Mine Car Dump MCD-1.	PE	B  A	T95  T96	PE  FE
MCD-1	40 Tons	I – 2001	Mine Car Dump MCD-1 - Receives coal from Conveyor C10-3 and transfers it to Conveyors C11 - 1 and/or C11-2 via feeders in the bottom of MCD-1.	PE	B A	T96 T72A, T72B	PE FE FE
C11-1	1,000 TPH	I – 1970	Conveyor C11-1 - Receives coal from Mine Car Dump MCD-1, Conveyor S3A and Conveyor C11-4, and transfers it to Rotary Breaker 13-1.	PE	B  A	T72A T73 T75 T111	FE PE PE PE
C11-2	1,000 TPH	I – 1970	Conveyor C11-2 - Receives coal from Mine Car Dump MCD-1, Conveyor C11-4, and Conveyor S3A and transfers it to Rotary Breaker 13-2.	PE	B  A	T72B T74 T76 T112	FE PE PE PE
C11-4	800 TPH	I -1979	Conveyor C11-4 - Receives coal from the Storage Pit ST-10 and transfers it to Belt Conveyor C11-1 and/or Belt Conveyor C11-2.	PE	B A	T4-9 T73 T74	PE PE PE
Rotary Breaker 13-1 (13-1E)	1,000 TPH	I – 1970	Rotary Breaker 13-1 - Receives coal from Conveyor C11-1. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T75  T8-1 T9-1A	PE  PE PE
Rotary Breaker 13-2 (13-2E)	1,000 TPH	I - 1970	Rotary Breaker 13-2 - Receives coal from Conveyor C11-2. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T76  T8-2 T9-1B	PE  PE PE
8A	Continued Under Refuse Circuit						
C24	Continued Under Raw Coal Handling System						

<b>Raw Coal Handling System</b>							
S10	4000 TPH	I - 1986 M – 1998 M – 2006	Conveyor S10 - Receives coal from No. 50 Mine and transfers it to Scalping Screen SS-1.  Equipped with SS-1 bypass chute to divert coal directly to ST-11	PE	B  A	-----  T50 T120	-----  FE N
S3A	2,500 TPH	I-1986 M-2002	Conveyor S3A – Receives coal from Scalping screen SS-1 and transfers it to Belt Conveyor C11-1 and/or C11-2.	PE	B A	T110 T111 T112	FE PE PE
SS-1	4000 TPH	I – 1998	Scalping Screen SS-1 - Receives coal from Conveyor S10. Oversized coal is routed to the Shawnee Rotary Breaker S6. Undersized coal goes to a two-way flop gate which can transfer coal to Conveyor RCT-1 or Conveyor S3B.	FE	B  A	T50  T54 T51 T53 T110	FE  FE FE FE FE
S6	1500 TPH	I-1986	Shawnee Rotary Breaker S6 - Receives coal from Scalping Screen SS-1. Refuse is transferred to Conveyor S7. Coal exiting the Rotary Breaker is transferred to Conveyor S5.	FE	B  A	T54  T28-3, T27-5	FE  PE PE
S7	Continued under Refuse Circuit						
RCT-1	4000 TPH	I – 1998	Conveyor RCT-1 – Receives coal from Scalping Screen SS-1 and transfers it to Conveyor S5.	FE	B A	T51 T52	FE FE
S5	4000 TPH	I - 1986 M – 1998	Conveyor S5 – Receives coal from Conveyor RCT-1 and Rotary Breaker S6, and transfers it to a Stack Tube/Stockpile ST-11. Note that Conveyor S5 was lengthened and its design capacity increased to 4,000 TPH.	PE	B  A	T52 T27-5  T49	FE PE  MD
ST-11	1,106,000 Tons	I - 1986 M-1998, 2001 M-2006	Stack Tube/Stockpile ST-11 - Receives coal from Conveyor S5, truck, and SS-1 bypass chute and transfers via underground feeder to Conveyor S3 and/or via front endloader to truck.	N	B  A	T49 T120 T103 T32 T102	MD N N FE N
S3	2,500 TPH	I - 1986	Conveyor S3 – Receives coal from underground feeder located beneath Stack Tube/Stockpile ST-11 and transfers it to Conveyor S3B.	PE	B  A	T32  T33	FE  PE
S3B	4,000 TPH	I - 1986 M – 1998	Conveyor S3B - Receives coal from Conveyor S3 and Scalping Screen SS-1 two-way flop gate, and routes it to 60" Raw Coal Belt Conveyor C24. Design capacity increased to 4,000 TPH.	PE	B  A	T33 T53  T34	PE FE  PE
C24	4,000 TPH	I - 1970 M- 1994	Conveyor C24 - Receives coal from Conveyor S3B and Rotary Breakers 13-1 and 13-2 and transfers it to Raw Coal Storage Silo A ST-3, Conveyor C31, or Conveyor C31-A.	FE	B  A	T34, T8-1, T8-2 T10-3, T10-2, T10-1	PE PE PE FE FE PE
<b>Raw Coal to Storage and to Preparation Plant</b>							
ST-3	6,000 Tons	I - 1970	6,000 Ton Raw Coal Storage Silo A ST-3 - Receives coal from Conveyor C24 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B  A	T10-3  T12-1	FE  FE
C31	4,000 TPH	I - 1970 M- 1994	Conveyor C31 - Receives coal from Conveyor C24 and transfers it to Raw Coal Storage Silo ST-4.	FE	B  A	T10-2  T10-4	FE  FE

ST-4	6,000 Tons	I - 1970	Raw Coal Storage Silo B ST-4 - Receives coal from Conveyor C31 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B A	T10-4 T12-2	FE FE
C31-A	4,000 TPH	I - 1981	Conveyor C31-A - Receives coal from Conveyor C24 and transfers coal to Stack Tube/Raw Coal Storage Stockpile ST-2.	PE	B A	T10-1 T11	PE MC
ST-2	77,000 Tons	I - 1981 M- 2001	Raw Coal Storage Stockpile ST-2 - Receives coal from Conveyor C31-A and truck dump and transfers it via front-endloader to Feeder C36, Storage Pit ST-10, trucks, and/or railcar.	N	B A	T11 T101 T100, T77 T113	MD MD MD MD, PE MD
C36	500 TPH	I - 1981	Feeder C36 - Receives coal from Raw Coal Storage Stockpile ST-2 and transfers it to the 48" Raw Coal Belt Conveyor C37.	PE	B A	T77 T12-3	PE FE
C37	1,500 TPH	I - 1970	48" Raw Coal Belt Conveyor C37 - Receives coal from the 48" Reciprocating Feeders from Raw Coal Storage Silos A and B (ST-3 and ST-4) and Feeder C36, and transfers it to Conveyor C45.	FE	B A	T12-1, T12-2, T12-3 T13	FE FE FE FE
C45	1,500 TPH	I - 1970	Conveyor C45 - Receives coal from Conveyor C37 and transfers it into the preparation plant.	PE	B A	T13 -----	FE -----
<b>Refuse Circuit</b>							
8A	400 TPH	I - 1992	Conveyor 8A - Receives refuse from Rotary Breakers 13-1 and 13-2. Refuse is transferred to Conveyor C8.	N	B A	T9-1a T9-1b T46-2	PE PE FE
C8	Continued below under C8						
S7	800 TPH	I - 1986	Conveyor S7 - Receives refuse from the Rotary Breaker S6 and transfers it to the 80 ton Rock Bin.	PE	B A	T28-3 T29	PE PE
Rock Bin	80 Ton	I - 1970	Rock Bin - Receives refuse from Conveyor S7 and transfers it to a 72" Reciprocating Feeder.	FE	B A	T29 -----	PE -----
Rock Crusher #6	280 TPH	I - 1970	Rock Crusher #6 - Receives refuse from Rock Bin and transfers it to 36" Rock Belt Conveyor C8.	FE	B A	T34-2a T35	FE FE
C8	400 TPH	I - 1970	36" Rock Belt Conveyor C8 - Receives refuse from Rock Bin #6, Rock Crusher #6, and Conveyor 8A. Transfers refuse to the 400 ton Refuse Bin ST-7.	PE	B A	T34-2b, T35, T46-2 T36	FE FE FE FE
C125	463 TPH	I - 1970	36" Plant Refuse Belt Conveyor C125 - Transfers refuse from the Preparation Plant's Washing Circuit to the 400 ton Refuse Bin ST-7.	PE	B A	----- T37	----- FE
ST-7	400 Ton	I - 1970	400 Ton Refuse Bin ST-7 - Receives coal refuse from 36" Rock Belt Conveyor C8 and 36" Plant Refuse Belt Conveyor C125 and transfers it to feeder 127 and then to Refuse Belt Conveyor C128-1 or the Emergency Refuse Stockpile.	FE	B A	T36 T37 -----	FE FE -----
C128-1	400 TPH	I - 1970	Conveyor - Receives refuse from Refuse Bin ST-7 and transfers it to Point "A" Storage Bin ST-8.	PE	B A	T38 T39	FE FE
ST-8	85 Tons	I - 1970	Point "A" Storage Bin ST-8 - Receives refuse from Conveyor C128-1 and transfers it to Belt Conveyor C128-2.	FE	B A	T39 -----	FE -----
C128-2	400 TPH	I - 1970	Conveyor C128-2 - Receives refuse from Storage Bin ST-8 and transfers it to Conveyor C128-3.	PE	B A	T40 T41	PE PE
C128-3	400 TPH	I - 1983	Conveyor C128-3 - Receives refuse from Conveyor C128-2 and transfers it to Conveyor C128-4.	N	B A	T41 T42	PE PE
C128-4	400 TPH	I - 1983	Conveyor C128-4 - Receives refuse from Conveyor C128-3 and transfers it to Conveyor C128-5.	N	B A	T42 T43	PE PE

C128-5	400 TPH	I – 2001	Conveyor C128-5 - Receives refuse from Conveyor C128-4 and transfers it to Conveyor C128-6.	N	B A	T43 T44	PE PE
C128-6	400 TPH	I-2006	Conveyor C128-6 - Receives refuse from Conveyor C128-5 and transfers it to Stacking Belt Conveyor.	PE	B A	T44 T121	PE PE
Stacking Belt Conveyor	400 TPH	I - 1970	Stacking Belt Conveyor - Receives refuse from Conveyor C128-6 and transfers it to the Refuse Stockpile ST-12.	PE	B A	T121 T45	PE MC
ST-12	26,000 Tons	I - 1970	Refuse Stockpile ST-12 – Receives refuse from Stacking Belt Conveyor and dozers move to permanent storage.	N	B A	T45 -----	MC -----
Rotary Breakers (13-1 & 13-2) Bypass							
Raw Coal Auger Sampler	N/A	I – 1998	Raw Coal Auger Sampler - Samples coal from dump trucks at the truck scales. Emissions are expected to be minimal.	N	B A	----- -----	----- -----
ST-10	50 Tons	I – 1979 M – 2001	Raw Coal Storage Pit ST-10 - Receives coal from dump trucks and front-endloader and transfers it to Conveyor C11-4.	PE	B A	T4-8 T105 T4-9	MC MC PE
C11-4	Continued Under Rotary Breakers ( 13-1 & 13-2 ) Circuit						
RC-1	Continued under Clean Coal Circuit						
Clean Coal Circuit							
TD1	800 TPH	I - 1970 M- 1996	McNally Fluidized bed Thermal Dryer with two cyclones and two venturi scrubbers.	CY,SC, ME	B A	----- 001-2 A,B	----- CY,SC, ME
C100	800 TPH	I - 1970	42" Dryer Feed Belt Conveyor C100 - Transfers wet coal from Preparation to Thermal Dryer, which dries it and transfers to Horizontal Axis Mixer No. 120.	PE	B A	----- T15	----- PE
C118	800 TPH	I - 1970 M-1995	54" Coarse Clean Coal Belt Conveyor - Receives coarse clean coal from inside Preparation Plant and transfers it to Horizontal Axis Mixer No. 120.	PE	B A	T48 T16	PE FE, SC
Horizontal Axis Mixer No. 120	320 TPH	I - 1970	Horizontal Axis Mixer No. 120. Receives coarse clean coal from Conveyor C118 and clean coal from Thermal Dryer, and transfers coal to 72" Clean Coal Transfer Belt Conveyor C119.	FE	B A	T16 T17	FE, SC FE, SC
C119	1,000 TPH	I - 1970	72" Clean Coal Transfer Belt Conveyor C119 - Receives coal from the Horizontal Axis Mixer No. 120 and transfers coal to 48" Clean Coal Belt Conveyor C132.	FE	B A	T17 T18	FE, SC FE, SC
C132	1,000 TPH	I - 1970	48" Clean Coal Belt Conveyor C132 - Receives coal from the 72" Clean Coal Transfer Belt Conveyor C119 and transfers it to the 10,000 Ton Clean Storage Silo ST-5 and/or Conveyor SC-1.	FE	B A	T18 T19, T19A	FE, SC FE FE
ST-5	10,000 Ton	I – 1970	Storage 4 - 10,000 Ton Clean Coal Storage Silo ST-5. Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfers it through one mass flow feeder and six 48" reciprocating feeders to a 72" Collecting Belt Conveyor C139.	FE	B A	T19 T20	FE FE, SC
C139	5,000 TPH	I - 1970 M - 1998	72" Collecting Belt Conveyor C139 - Receives coal from Storage 4 (ST-5) through one mass flow feeder and six 48" reciprocating feeders. Transfers coal to the 72" Belt Conveyor to Sampling Tower C141. Design capacity increased to 5,000 TPH.	FE	B A	T20 T21	FE, SC FE



C141	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor C141 - Receives coal from 72" Collecting Belt Conveyor C139 and Conveyor RC-1, and transfers it to the 72" Belt Conveyor C152. Design capacity increased to 5,000 TPH. A small portion of coal from Conveyor C141 is transferred to and from the Clean Coal Sampler System.	FE	B  A	T21, T23  T24	FE FE  FE
Clean Coal Sampler System (F01 & F02)	N/A	I - 1970 M - 1998	Clean Coal Sampler System - Receives coal from 72" Belt Conveyor C141 via Primary Sample Belt Conveyor and transfers it to the Primary Sample Crusher and the Nuclear Analyzer and subsequently back to conveyor C141.	FE	B  A	-----  -----	-----  -----
C152	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor to Loading Bin C152 - Receives coal from 72" Belt Conveyor C141 and transfers it to the 200 Ton Loading Bin ST-6. Design capacity increased to 5,000 TPH.	FE	B  A	T24  T25	FE  FE
ST-6	200 Ton	I - 1970 M - 2001 M - 2004	200 Ton Loading Bin ST-6 - Receives coal from the 72" Belt Conveyor C152 and transfer it to railroad cars.	FE	B  A	T25  T26	FE  FE, DSS
SC-1	1,000 TPH	I - 1991	Belt Conveyor SC-1 - Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfer it to the Stack Tube/Clean Coal Storage Stockpile ST-13.	PE	B  A	T19A  T19B	FE  MC
ST-13	514,000 Tons	I - 1991 M - 1998 M - 2002	Stack Tube/Clean Coal Storage Stockpile ST-13 - Receives clean coal from Conveyor SC-1 and transfers it using six vibrating feeders to Belt Conveyor RC-1 and/or via front end loader to trucks. Up to 360,000 TPY combined may be trucked to and from ST-13.	N	B  A	T19B T114  T22 T115	MC N  FE N
RC-1	4,000 TPH	I - 1991 M - 1998	Belt Conveyor RC-1 - Receives coal from six vibrating feeders located underneath the Clean Coal Storage Stockpile ST-13 and also from Belt Conveyor C141, and transfers it to the 72" Belt	PE	B  A	T22  T81 T23	FE PE FE
<b>Trucked Coal and Coal Fines Circuit</b>							
ST-16 (ST-16E)		I - 2002 A - 2008	Coal & Pond Fines Open Stockpile ST-16 - Receives coal and pond fines by truck and transfers it via front-end loader to Dump Hopper DHRC-4; via underground feeders to conveyor C120; and/or via front-end loader to truck.	N	B  A	T122 T134 T124 T135 T126	N N PE MD FE
DHRC-4 (DHRC-4E)		N	Dump Hopper DHRC-4 - Receives coal and/or pond fines by front-end loader and transfers it to Conveyor C120.	PE	B  A	T124  T125	MD  MD
C120 (C120E)	1,150 TPH	I - 2002 A - 2008	Conveyor C120 - Receives coal and/or pond fines from Stockpile ST-16's underground feeders and/or Dump Hopper DHRC-4 and transfers it to Conveyor C121 or Conveyor RC-5.	PE	B  A	T125 T126 T127A T127B	MD FE PE PE
C121 (C121E)	5 TPH	I - 2002 A - 2008	Conveyor C121 - Receives coal and/or pond fines from Conveyor C120 and transfers it to Conveyor C122 and Sample Collector.	PE	B  A	T127A  T128	PE  PE
C122 (C122E)	5 TPH	I - 2002 A - 2008	Conveyor C122 - Receives coal and/or pond fines from Conveyor C121 and transfers it to Conveyor RC5.	PE	B  A	T129  T130	PE  PE
RC-5 (RC-5E)	4000 TPH	I - 1998 M - 1999 M - 2001	Belt Conveyor RC-5 - Receives coal and/or coal fines from Conveyor C120 and C122 and transfers to Conveyor RC-1 (see Clean Coal Circuit).	N	B  A	T125 T127B T130 T81	PE PE PE PE
<b>Roadways</b>							
PRP	N/A	I - 1970 M - 2001	Paved Roadways and parking lots.	RWMW	N/A	N/A	N/A



URP	N/A	I - 1970 M- 2001	Unpaved Roadways and parking lots	RWMW	N/A	N/A	N/A
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- (1) Method of Control abbreviations: FE - Full Enclosure, PE - Partial Enclosure, MD - Minimization of Material Drop Height, N – None, MC – Moisture Control, DSS – Dust suppressant Spray, CY – Cyclones, SC – Scrubbers, ME – Mist Eliminator, RWMW – Water Truck with Manufactured Pressurized sprays
- (2) I – Year Installed, M- Year Modified, A-Year Added , N-Not installed yet

## 1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2183K	April 28, 2008

## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NSPS</b>	New Source Performance
<b>CBI</b>	Confidential Business Information		Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations		
<b>CO</b>	Carbon Monoxide	<b>pph</b>	Pounds per Hour
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>ppm</b>	Parts per Million
<b>DAQ</b>	Division of Air Quality	<b>PSD</b>	Prevention of Significant Deterioration
<b>DEP</b>	Department of Environmental Protection	<b>psi</b>	Pounds per Square Inch
<b>FOIA</b>	Freedom of Information Act	<b>SIC</b>	Standard Industrial Classification
<b>HAP</b>	Hazardous Air Pollutant		
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>m</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
		<b>USEPA</b>	United States Environmental Protection Agency
<b>mm</b>	Million		
<b>mmBtu/hr</b>	Million British Thermal Units per Hour	<b>UTM</b>	Universal Transverse Mercator
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards	<b>VOC</b>	Volatile Organic Compounds
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		
<b>NO<sub>x</sub></b>	Nitrogen Oxides		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
  - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.
- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39 40]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

## **2.16. Need to Halt or Reduce Activity not a Defense**

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

## **2.17. Emergency**

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**[45CSR§30-5.7.c.]**

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

**[45CSR§30-5.7.d.]**

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**[45CSR§305.7.e.]**

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

**[45CSR§30-5.2.a.]**

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

**[45CSR§30-5.1.f.5.]**

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

**[45CSR§30-4.2.]**



## **2.21. Permit Shield**

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§305.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and ~~45CSR38~~]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§305.1.e.]**

## **2.24. Property Rights**

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
  - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
  - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40 C.F.R. §61.145(b) and 45CSR34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. [45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. [W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

**[40 C.F.R. 68]**

- 3.1.9. Fugitive dust control methods, such as full enclosures, partial enclosures, and water sprays, proposed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments or supplements thereto shall be installed, operated, and maintained in such a manner so as to minimize the generation and atmospheric entrainment of fugitive particulate emissions. A freeze protection plan shall be incorporated to insure that the wet suppression systems remain operational at all times. In accordance with the information filed, the methods of control given in the Equipment Table in Section 1.0. of this permit shall be installed, maintained, and operated so as to minimize the emission of PM (particulate matter) and PM<sub>10</sub> (particulate matter less than ten microns in diameter).

**[45CSR13, R13-2183, A.10.]**

- 3.1.10. The permittee shall maintain a water truck on site and in good operating condition, and shall utilize same to apply water, or a mixture of water and an environmentally acceptable dust control additive, hereinafter referred to as solution, as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used.

The spraybar shall be equipped with commercially available spray nozzles, of sufficient size and number, so as to provide adequate coverage to the surface being treated.

The pump delivering the water, or solution shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water, or solution, and at a sufficient pressure.

**[45CSR13, R13-2183, A.11.]**

- 3.1.11. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any fugitive dust control system, coal processing and conveying equipment, coal storage system, or coal transfer and loading system which is twenty percent (20%) opacity or greater. These opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. Note that the regulatory citations 40 C.F.R. §§ 60.254(a), 60.11(c), and 45CSR16 (below) apply only to the 40 C.F.R. 60 Subpart Y affected facilities, which are those listed in Section 5.0. of this permit.

**[45CSR13, R13-2183, B.2. & B.4; 45CSR§5-3.4.; 40 C.F.R. §60.254(a); 40 C.F.R. §60.11(c); 45CSR16]**

- 3.1.12. No person shall cause, suffer, allow or permit a coal preparation plant or handling operation to operate that is not equipped with a fugitive dust control system. This system shall be operated and maintained in such a manner as to minimize the emission of particulate matter into the open air.

**[45CSR13, R13-2183, B.2., and 45CSR§5-6.1.]**

- 3.1.13. The owner or operator of a coal preparation plant or handling operation shall maintain dust control of the premises and owned, leased, or controlled access roads by paving, or other suitable measures. Good operating practices shall be observed in relation to stockpiling, car loading, breaking, screening, and general maintenance to minimize dust generation and atmospheric entrainment.

[45CSR13, R13-2183, B.2., and 45CSR§5-6.2.]

- 3.1.14. The permitted facility shall be constructed and operated in accordance with information filed in Permit Applications R13-2183K, R13-2183J, R13-2183I, R13-2183G, R13-2183F, R13-2183E, R13-2183D, R13-2183C, R13-2183B (PD99-169), R13-2183A (PD99-062), R13-2183, and R13-1831 and any amendments thereto.

[45CSR13, R13-2183, A.1.]

### 3.2. Monitoring Requirements

- 3.2.1. The permittee shall conduct monitoring/recordkeeping/reporting as follows: [Not required for stockpiles and haulroads – OS1, ST-14, ST-2, ST-11, ST-12, ST-13, ST-16, PRP, URP] To determine compliance with the opacity limit of permit condition 3.1.11., the permittee shall conduct weekly visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for all coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed. Records of all observations shall be maintained in accordance with permit condition 3.4.4.

[45CSR§30-5.1.c.]

- 3.2.2. The permittee shall inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken as a result of the monthly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 3.2.3. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.

[45CSR§30-5.1.c.]

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment,

such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a sourcespecific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language.
  2. The result of the test for each permit or rule condition.
  3. A statement of compliance or non-compliance with each permit or rule condition.

**[WV Code §§ 2254(a)(14-15) and 45CSR13]**

- 3.3.2. Any stack venting thermal dryer exhaust gases and/or air table exhaust gases or exhaust gases or air from any air pollution control device shall include straight runs of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. Flow straightening devices shall be required where cyclonic gas flow would exist in the absence of such devices.  
**[45CSR13, R13-2183, B.2., 45CSR§5-12.6.]**
- 3.3.3. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, the owner or operator of such facility shall conduct performance test(s) to determine compliance with emission limitations set forth in 40 C.F.R. §60.254(a) and furnish a written report of the results of such performance test(s).

**[40 C.F.R. §60.8(a), 45CSR16, and 45CSR13, R13-2183, B.4.] [DHRC-4, C120, C121 and C122]**

### **3.4. Recordkeeping Requirements**

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

**[45CSR§30-5.1.c.2.A.]**

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

**[45CSR§30-5.1.c.2.B.]**

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§30-5.1.c. State-Enforceable only.]**

3.4.4. A record of each visible emissions observation required by permit condition 3.2.1. shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.

**[45CSR§30-5.1.c.]**

### **3.5. Reporting Requirements**

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**[45CSR§§30-4.4. and 5.1.c.3.D.]**

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

**[45CSR§30-5.1.c.3.E.]**

- 3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV  
25304

**US EPA:**

~~Section Chief~~ [Associate Director](#)  
~~Office of Air Enforcement and Compliance Assistance~~  
~~(3AP20)~~  
U. S. Environmental Protection Agency, Region III  
[Enforcement and Compliance Assurance Division](#)  
[Air Section \(3ED21\)](#)  
1650 Arch Street  
Philadelphia, PA 19103-2029

**DAQ Compliance and Enforcement<sup>1</sup>:**

DEPAirQualityReports@wv.gov

<sup>1</sup>For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.

**[45CSR§30-8.]**

- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

**DAQ:**

DEPAirQualityReports@wv.gov

**US EPA:**

R3\_APD\_Permits@epa.gov

**[45CSR§30-5.3.e.]**



- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

**DAQ:**

DEPAirQualityReports@wv.gov

**[45CSR§30-5.1.c.3.A.]**

- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

- 3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
  2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
  3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
  4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

**[45CSR§30-5.1.c.3.C.]**

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

**[45CSR§30-5.1.c.3.B.]**

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

**[45CSR§30-4.3.h.1.B.]**

### 3.6. Compliance Plan

- 3.6.1. There is no compliance plan since the permittee certified compliance with all applicable requirements in the renewal application.

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
- 3.7.3.

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the <del>third</del> <u>fourth</u> permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the second renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-02A, 001-02B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee's calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control "major source". Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p>

	<p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p>
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#### 4.0 Thermal Dryer [emission point ID(s): TD1]

##### 4.1. Limitations and Standards

4.1.1. The thermal dryer shall not be operated more than 7,083 hours per year. The permittee shall maintain records showing the number of hours each calendar day the thermal dryer was in operation.

[45CSR13, R13-2183, A.2.]

4.1.2. Emissions from the thermal dryer shall not exceed the following hourly and annual limits:

Pollutant	Emissions Limitations	
	One-Hour Average (lb/hour)	Annual (ton/year)
Volatile Organic Compounds (VOCs)	41.3	146
SO <sub>2</sub>	50.3	178
NO <sub>x</sub>	93.9	332
CO	50.3	178
Particulate Matter (PM)	77.0	272

[45CSR13, R13-2183, A.4.]

4.1.3. Scrubber water flow shall be maintained at a minimum of 2,240 gpm. The scrubber water system shall receive clean water from the clarifier water sump and shall discharge dirty water to the clarifier centerwell for solids removal. Pressure drop across the scrubber shall be adjusted as required to control particulate matter emissions. Alkaline agents may be added to the scrubber water to control sulfur dioxide emissions.

[45CSR13, R13-2183, A.5.]

4.1.4. No person shall cause, suffer, allow, or permit the emission into open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 ppmv by volume from existing source operations.

[45CSR13, R13-2183, B.3., and 45CSR§10-4.1.]

4.1.5. No person shall cause, suffer, allow or permit emission of particulate matter into the open air from any stack which is twenty percent (20%) opacity or greater, except as noted in 45CSR§5-3.2.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.1.]

4.1.6. The provisions of permit condition 4.1.5. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period or periods aggregating no more than five (5) minutes in any sixty (60) minute period during operation.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.2.]

4.1.7. The provisions permit conditions 4.1.5. and 4.1.6. shall not apply to particulate matter emitted, which is less than sixty percent (60%) opacity for a period of up to eight (8) minutes in any operating day for the purposes of building a fire of operating quality in the fuel burning equipment of a thermal dryer.

[45CSR13, R13-2183, B.2., and 45CSR§5-3.3.]

- 4.1.8. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from the thermal dryer exhaust in excess of 0.083 grains per standard cubic foot.  
[45CSR13, R13-2183, B.2., 45CSR§5-4.1.b., and 45CSR5 Appendix 1.2.]
- 4.1.9. No person shall circumvent 45CSR§5-4.1.b. (permit condition 4.1.8) by adding additional gas to any dryer exhaust or group of dryer exhaust for the purpose of reducing the grain loading.  
[45CSR13, R13-2183, B.2., and 45CSR§5-4.2.]
- 4.1.10. No person shall cause, suffer, allow or permit the exhaust gases from a thermal dryer to be vented into the open air at an altitude of less than eighty (80) feet above the foundation grade of the structure containing the dryer or less than ten (10) feet above the top of the said structure or any adjacent structure, whichever is greater. In determining the desirable height of a plant stack, due consideration shall be given to the local topography, meteorology, the location of nearby dwellings and public roads, the stack emission rate, and good engineering practice as set forth in 45CSR20.  
[45CSR13, R13-2183, B.2., and 45CSR§5-4.3.]

## 4.2. Monitoring Requirements

Note: For purposes of complying with 40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM), the words “indicator” or “indicators” shall mean the specific parameters to be monitored, measured, polled, or sampled (as applicable). Operation of the equipment while each indicator is within the acceptable range (defined below for each indicator) will provide a reasonable assurance of compliance with applicable emission limitations or standards for the anticipated range of operations of the equipment.

- 4.2.1. **Thermal Dryer Exhaust Temperature** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the temperature of the gas stream at the exit of the thermal dryer between the dryer exhaust fan and the venturi scrubbers. An excursion shall be defined as a 1-hour average temperature outside of the acceptable thermal dryer exhaust temperature defined as 170°F to 240°F. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus three degrees Fahrenheit ( $\pm 3$  °F) and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 1 of 3 for particulate matter control under the 40 C.F.R. 64 plan.  
[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.1. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]

- 4.2.2. **Scrubber Water Supply Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the water supply pressure to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber water supply pressure defined as 7-psig. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus five percent ( $\pm 5\%$ ) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 2 of 3 for particulate matter control, and also Indicator 1 of 3 for sulfur dioxide control, under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.b. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]**
- 4.2.3. **Scrubber Inlet Static Pressure** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss through the scrubber. The pressure drop will be measured at the inlet to the scrubber. An excursion shall be defined as a 1-hour average pressure less than the minimum acceptable scrubber inlet static pressure defined as 18 inches of water column. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). The monitoring device is to be certified by the manufacturer to be accurate within plus or minus one inch ( $\pm 1$  in.) water column and be recalibrated as necessary, but at least semi-annually. The monitoring system shall continually sense the indicator, poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This is Indicator 3 of 3 for particulate matter control under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, B.2.; 45CSR§§5-4.1.b. & 9.2; and 45CSR5 Appendices 2.2.a. and 2.3.; 40 C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2); 45CSR§30-12.7.]**
- 4.2.4. **Dryer Fuel Coal Sulfur Content** – The permittee shall sample in accordance with approved ASTM methods on at least a daily basis the fuel coal burned in the furnaces and have the samples analyzed for sulfur and BTU content. The analysis results shall be accurate within  $\pm 0.1$  weight percent. Result of these analyses shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. If the sulfur content exceeds 1.09 percent on a dry basis, the permittee shall add sodium hydroxide solution in accordance with permit condition 4.2.5. to the scrubber water and/or to the coal being dried to reduce sulfur dioxide emissions. Compliance with the more stringent limit (1.09 weight percent before adding NaOH) proposed by the permittee, and enforceable under 45CSR§30-12.7., ensures compliance with the 1.22 weight percent threshold prior to NaOH addition set forth by R13-2183, A.3. An excursion shall be defined as exceeding the 1.09 weight percent limit without addition of sodium hydroxide in accordance with permit condition 4.2.5. Excursions trigger an inspection and evaluation, corrective action, recordkeeping and reporting requirements (permit conditions 4.2.10., 4.4.3., and 4.5.1.). This permit condition accounts for Indicator 2 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan. **[45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.; 45CSR§10-8.2.c.]**

- 4.2.5. **Sodium Hydroxide (NaOH) Addition Rate** – The metering pump shall be used to add 0.51 gallons per minute of 20% sodium hydroxide solution to the scrubber water and/or to the coal being dried based upon sulfur content determined under permit condition 4.2.4. The metering pump used to add NaOH solution shall be calibrated monthly during NaOH addition by measuring the time to deliver a specified volume of the solution. The minimum accuracy of the metering pump shall be  $\pm 0.1$  gallons per minute. The monitoring system shall continually sense the indicator (NaOH addition rate), poll the indicator several times per minute, compute 1-minute averages, and use these 1-minute averages to compute and record a 1-hour average. This permit condition accounts for Indicator 3 of 3 for sulfur dioxide control under the 40 C.F.R. 64 plan.  
[45CSR13, R13-2183, A.3., and 40 C.F.R. §64.3(b); 45CSR§30-12.7.]
- 4.2.6. To determine compliance with the opacity limits of permit condition 4.1.5., the permittee shall conduct daily visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for the thermal dryer. These observations shall be conducted during periods of normal facility operation for a sufficient time interval (but no less than one (1) minute) to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within 24 hours. A 40CFR60 Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.  
[45CSR§30-5.1.c.]
- 4.2.7. The thermal dryer unit(s) included in this permit shall be observed visually during periods of building a fire of operating quality and minimization efforts taken to ensure particulate matter emissions of sixty percent (60 %) opacity for a period of up to 8 minutes in any operating day is not exceeded during such activities.  
[45CSR§30-5.1.c.]
- 4.2.8. **Proper maintenance.** At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.  
[40 C.F.R. § 64.7(b); 45CSR§30-5.1.c.]
- 4.2.9. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 C.F.R. 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.  
[40 C.F.R. § 64.7(c); 45CSR§30-5.1.c.]



#### 4.2.10. **Response to Excursions or Exceedances**

(1) Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 C.F.R. § 64.7(d); 45CSR§30-5.1.c.]

- 4.2.11. **Documentation of need for improved monitoring.** After approval of monitoring under 40 C.F.R. 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 C.F.R. § 64.7(e); 45CSR§30-5.1.c.]

- 4.2.12. The permittee shall maintain daily records of the coal throughput of the thermal dryer and record the rolling yearly total of coal. A rolling yearly total shall mean the sum of coal throughput at any given time for the previous twelve (12) months.

[45CSR§30-5.1.c.]

### 4.3. **Testing Requirements**

- 4.3.1. At such reasonable times as the Secretary may designate, the owner or operator of a source(s) of any fuel burning unit(s) manufacturing process source(s) or combustion source(s) may be required to conduct or have conducted tests to determine the compliance of such source(s) with the emission limitations of section 3, 4 or 5 of 45CSR10. Such tests shall be conducted in accordance with the appropriate test methods 40 C.F.R. 60, Appendix A, Method 6, Method 15 or other equivalent EPA testing method approved by the Secretary. The Secretary, or his or her duly authorized representative, may at his or her option witness or conduct such tests. Should the Secretary exercise his or her option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports to be located in such a manner as the

Secretary may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.a.]**

- 4.3.2. The Secretary, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§10-3.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.1.b.]**

- 4.3.3. At the request of the Secretary the owner and/or operator of a source shall install such stack gas monitoring devices as the Secretary deems necessary to determine compliance with the provisions of 45CSR§10-4.1. The data from such devices shall be readily available at the source location or such other reasonable location that the Secretary may specify. At the request of the Secretary, or his or her duly authorized representative, such data shall be made available for inspection or copying. Failure to promptly provide such data shall constitute a violation of 45CSR10.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.a.]**

- 4.3.4. Prior to the installation of calibrated stack gas monitoring devices, sulfur dioxide emission rates shall be calculated on an equivalent fuel sulfur content basis.

**[45CSR13, R13-2183, B.3., and 45CSR§10-8.2.b.]**

- 4.3.5. The permittee ~~shall~~ was required to conduct particulate matter stack testing no later than September 26, 2017, ~~and shall~~ to establish and/or verify existing parameter indicator ranges. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

The Director shall be furnished with a written report of the results of such testing and established indicator ranges. The permittee shall use Method 5 or an alternative method approved by the Director for such testing. Parameter indicator ranges shall be re-established or verified for the exhaust temperature of the thermal dryer, water pressure to the scrubber, and the scrubber inlet static pressure. The permittee shall re-establish and/or verify these indicator ranges and operate within these ranges to provide a reasonable assurance that the thermal dryer unit is in compliance with opacity and particulate loading limits. The permittee shall take immediate corrective action when a parameter falls outside the indicator range established for that parameter and shall record the cause and corrective measures taken. The permittee shall also record the following parameters during such testing:

- a. Opacity readings on the exhaust stack following the procedures of Method 9;
- b. Amount of coal burned and the amount of coal dried;
- c. Coal drying temperature and residence time in the dryer;
- d. Temperature of the gas stream at the exit of the thermal dryer;
- e. Flow rate through the dryer and converted to dry standard cubic feet;
- f. Water pressure to the control equipment; and
- g. Scrubber inlet static pressure. The static pressure at the inlet of the scrubber will be measured.

Subsequent testing to determine compliance with the particulate loading limitations permit condition 4.1.8. shall be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Initial	$\leq 50\%$ of particulate loading limit	Once/5 years
Initial	between 50% and 90 % of particulate loading limit	Once/3 years
Initial	$\geq 90\%$ of particulate loading limit	Annual
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates $\leq 50\%$ of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90% of particulate loading limit	Once/3 years
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate $\geq 90\%$ of particulate loading limit	Annual

~~Note: Previous testing was performed in 2012. Based upon those results, testing was not required again until 2017.~~

[45CSR§30-5.1.c.]

#### 4.4. Recordkeeping Requirements

- 4.4.1. A record of each visible emissions observation shall be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records shall be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the daily inspections, and the times the thermal dryer air pollution control system is inoperable and any corrective actions taken.

[45CSR§30-5.1.c.]

- 4.4.2. All thermal dryer scrubber malfunctions must be documented in writing. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. At a minimum, the following information must be documented for each malfunction:

- Cause of malfunction
- Steps taken to:

- i. correct the malfunction
  - ii. minimize emissions during malfunction
- c. Duration of malfunction in hours
- d. Estimated increase in emissions during the malfunction
- e. Any change/modifications to equipment or procedures that would help prevent future recurrence of malfunction.

**[45CSR13, R13-2183, B.1.]**

#### **4.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- (2) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**[40 C.F.R. §64.9(b); 45CSR§30-5.1.c.]**

### **4.5. Reporting Requirements**

#### **4.5.1. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)**

- (1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.
- (2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:
  - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - (iii) A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

**[40 C.F.R. §64.9(a); 45CSR§30-5.1.c.]**

#### **4.6. Compliance Plan**

4.6.1. N/A

**5.0 Transfer Points Subject to 40 C.F.R. 60, Subpart Y [emission point ID(s): Truck Dumping [at ST-10 (T4-8) and DH-3 (T93)]; Endloader [at OS-1 (T92), ST-2 (T77, T100 and T113), ST-10 (T105 and T4-9), ST-11 (T102), ST-13 (T119), ST-14 (T104), ST-16 (T135), DH-3 (T94, T95), DHRC-4 (T124, T125)]; Rail Car Loading Bin ST-6 (T25 and T26); Mine Car Dump MCD-1 (T72A and T72B); Conveyors: C24 (T10-1, T10-2 and T10-3), C31 (T10-4), C31A (T11), C36 Feeder (T12-3), C118 (T16), C132 (T19, T19A), SC-1 (T19B), ST-5 Reclaim System (T20), C139 (T21), ST-13 Reclaim System (T22), RC-1 (T23), C141 (T24), C152 (T25), ST-6 Reclaim System (T26), S3A (T111 and T112), S7 (T29), ST-11 Reclaim System (T32), S3 (T33), S3B (T34), C128-3 (T42), C128-4 (T43), 8A (T46-2), S5 (T49), S10 (T50), RCT-1 (T52), C11-4 (T73, T74), RC-5 (T81), C10-3 (T96), C128-5 (T44), C128-6 (T121), C120 (T127A, T127B), C121 (T128, T129), C122 (T130); Breaker: S6 (T54, T27-5, and T28-3); Screen: SS-1 (T50, T51, T53, and T54)]**

## 5.1. Limitations and Standards

5.1.1. In accordance with the information filed, the following processing limits shall not be exceeded:

Type of Material and Location Where Processed	Maximum Amount to be Processed (TPY)
Raw coal feed from No. 50 Mine to Scalping Screen (SS-1)	6,900,000
Raw coal feed to Wet Wash Circuit/Preparation Plant (1,500 ton/hr * 7,083 hr/yr)	10,630,000
Feed coal from Wash Circuit to Thermal Dryer (800 ton/hr * 7,083 hr/yr)	5,670,000
Trucked Coal and/or Coal Fines from Conveyor RC-5 to Conveyor RC-1.	860,000
Clean coal/Coal Fines from Loading Bin ST-6 to railroad cars	8,100,000

[45CSR13, R13-2183, A.6.]

5.1.2. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 C.F.R. §60.11(d), 45CSR16, and 45CSR13, R13-2183, B.4.]

## 5.2. Monitoring Requirements

5.2.1. Refer to permit conditions 3.2.1. and 3.2.2.

## 5.3. Testing Requirements

5.3.1. Reserved.

#### **5.4. Recordkeeping Requirements**

5.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit condition 5.1.1., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachment A. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.  
**[45CSR13, R13-2183, B.6. and A.9.]**

5.4.2. Refer to permit conditions 3.4.4.

#### **5.5. Reporting Requirements**

5.5.1. Reserved.

#### **5.6. Compliance Plan**

5.6.1. N/A

## 6.0 Coal Storage and Stockpiles [emission point ID(s): OS-1, ST-2, ST-10, ST-11, ST-13, ST-14, ST-16]

### 6.1. Limitations and Standards

- 6.1.1. In accordance with the information filed, the following storage and truck delivery limits shall not be exceeded:

Stockpile/Bin ID No.	Material Stored	Maximum in Storage (tons)	Maximum to be Delivered (TPY) <sup>1</sup>
Stockpile OS-1	raw coal	631,000	250,000
Stockpile ST-2	raw coal	77,000	180,000
Storage Pit ST-10	raw coal	≈ 50	550,000 <sup>2, 3, 6</sup>
Stockpile ST-11	raw coal	1,106,000	100,000 <sup>4</sup>
Stockpile ST-13	clean coal	514,000	360,000 <sup>5</sup>
Stockpile ST-14	raw coal	54,000	750,000 to 1,000,000 <sup>6</sup>
Stockpile ST-16	coal	120,000	360,000 <sup>7</sup>
	coal fines	Combined	500,000 <sup>8</sup>

- (1) Maximum quantity of coal to be delivered via trucks by other suppliers from outside sources.  
(2) Less the amount delivered directly to Stockpile ST-2.  
(3) 0 TPY up to 250,000 TPY of the 550,000 TPY will pass over the truck scale near the refuse road.  
(4) Less the amount transferred from other stockpiles.  
(5) Up to 360,000 TPY combined may be received at or shipped from ST-13 by truck.  
(6) The sum of coal trucked to Storage Pit ST-10 via the truck scale and the coal trucked to Stockpile ST-14 shall not exceed 1.0 million TPY.  
(7) Up to 360,000 TPY of coal may be received at or shipped from ST-16 by truck.  
(8) Up to 500,000 TPY of coal fines may be received at ST-16 by truck.

### [45CSR13, R13-2183, A.7.]

- 6.1.2. In accordance with the information filed, the following transfer limits between coal storage areas shall not be exceeded:

Originating Stockpile ID No.	Maximum Amount to be Transferred to Stockpiles Listed Below (TPY) <sup>1</sup>						
	OS-1	ST-2	ST-10	ST-11	ST-13	ST-14	ST-16
OS-1	-----	100,000	350,000	100,000	100,000	100,000	100,000
ST-2	100,000	-----	280,000 <sup>3</sup>	100,000	100,000	100,000	100,000
ST-10	0	0	-----	0	0	0	0
ST-11	100,000	100,000	100,000	-----	100,000	100,000	100,000
ST-13	100,000	100,000	100,000	100,000	-----	100,000	100,000
ST-14	100,000	100,000	100,000	100,000	100,000	-----	100,000
ST-16	100,000	100,000	100,000	100,000	100,000	100,000	-----
<b>All Areas<sup>2</sup></b>	100,000	100,000	530,000	100,000	100,000	100,000	100,000

- (1) The quantities to be received for any single storage area are not additive.  
(2) The last row summarizes the maximum amount that could be transferred to each storage area from all other storage areas.  
(3) The permittee has the option to alternatively load up to 180,000 TPY into a railcar at ST-2 in lieu of transferring it to ST-10.



[45CSR13, R13-2183, A.8.]

- 6.1.3. The permittee shall maintain and operate a vacuum truck along the paved entrance(s) to Stockpile OS-1 at all times during which truck traffic is present, either receiving or shipping coal.

[45CSR13, R13-2183, A.12.]

## **6.2. Monitoring Requirements**

- 6.2.1. Reserved.

## **6.3. Testing Requirements**

- 6.3.1. Reserved.

## **6.4. Recordkeeping Requirements**

- 6.4.1. For the purpose of determining compliance with the maximum throughput limits set forth in permit conditions 6.1.1. and 6.1.2., the permittee shall maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments B and C. Records shall be certified by a “responsible official” and maintained on site for a period of not less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request. Compliance with all annual throughput limits shall be determined using a twelve month rolling total.

[45CSR13, R13-2183, B.6. and A.9.]

## **6.5. Reporting Requirements**

- 6.5.1. Reserved.

## **6.6. Compliance Plan**

- 6.6.1. N/A

## **7.0 Refuse Bin, Refuse Area, Refuse Stockpile [emission point ID(s): ST-7, ST-8, ST-12]**

### **7.1. Limitations and Standards**

- 7.1.1. In order to prevent and control air pollution from coal refuse disposal areas, the operation of coal refuse disposal areas shall be conducted in accordance with the standards established by 45CSR§5-7 (7.1.2. through 7.1.8.).  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.1.]**
- 7.1.2. Coal refuse is not to be deposited on any coal refuse disposal area unless the coal refuse is deposited in such a manner as to minimize the possibility of ignition of the coal refuse.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.2.]**
- 7.1.3. Coal refuse disposal areas shall not be so located with respect to mine openings, tipples, or other mine buildings, unprotected coal outcrops or steam lines, that these external factors will contribute to the ignition of the coal refuse on such coal refuse disposal areas.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.3.]**
- 7.1.4. Vegetation and combustible materials shall not be left on the ground at the site where a coal refuse pile is to be established, unless it is rendered inert before coal refuse is deposited on such site.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.4.]**
- 7.1.5. Coal refuse shall not be dumped or deposited on a coal refuse pile known to be burning, except for the purpose of controlling the fire or where the additional coal refuse will not tend to ignite or where such dumping will not result in statutory air pollution.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.5.]**
- 7.1.6. Materials with low ignition points used in the production or preparation of coal, including but not limited to wood, brattice cloth, waste paper, rags, oil and grease, shall not be deposited on any coal refuse disposal area or in such proximity as will reasonably contribute to the ignition of a coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.6.]**
- 7.1.7. Garbage, trash, household refuse, and like materials shall not be deposited on or near any coal refuse disposal area.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.7.]**
- 7.1.8. The deliberate ignition of a coal refuse disposal area or the ignition of any materials on such an area by any person or persons is prohibited.  
**[45CSR13, R13-2183, B.2., and 45CSR§5-7.8.]**

- 7.1.9. Each burning coal refuse disposal area which allegedly causes air pollution shall be investigated by the Secretary in accordance with the following: With respect to all burning coal refuse disposal areas, the person responsible for such coal refuse disposal areas or the land on which such coal refuse disposal areas are located shall use due diligence to control air pollution from such coal refuse disposal areas. Consistent with the declaration of policy and purpose set forth in section one of chapter twenty-two, article five of the code of West Virginia, as amended, the Secretary shall determine what constitutes due diligence with respect to each such burning coal refuse disposal area. When a study of any burning coal refuse disposal area by the Secretary establishes that air pollution exists or may be created, the person responsible for such coal refuse disposal area or the land on which such coal refuse disposal area is located shall submit to the Secretary a report setting forth satisfactory methods and procedures to eliminate, prevent, or reduce such air pollution. The report shall be submitted within such time as the Secretary shall specify. The report for the elimination, prevention or reduction of air pollution shall contain sufficient information, including completion dates, to establish that such program can be executed with due diligence. If approved by the Secretary, the corrective measures and completion dates shall be embodied in a consent order issued pursuant to W.Va. Code 22-5-1 et seq. If such report is not submitted as requested or if the Secretary determines that the methods and procedures set forth in such report are not adequate to reasonably control such air pollution, then a hearing will be held pursuant to the procedures established by W.Va. Code 22-5. [45CSR13, R13-2183, B.2., and 45CSR§§5-8.1. and 8.3.]

- 7.1.10. The maximum amount of refuse in storage at the Refuse Storage ST-12 shall not exceed 26,000 tons. [45CSR13, R13-2183, A.7.]

## **7.2. Monitoring Requirements**

- 7.2.1. Reserved.

## **7.3. Testing Requirements**

- 7.3.1. Reserved.

## **7.4. Recordkeeping Requirements**

- 7.4.1. For the purpose of determining compliance with the maximum storage limit set forth in permit condition 7.1.10., the permittee shall maintain daily records of the amount (in tons) of refuse in storage at the beginning of each day, the amounts transferred to and from ST-12 each day, and the amount of refuse in storage at the end of each day. To facilitate this recordkeeping, an example data form is provided as Attachment D. [45CSR§30-5.1.c.]

## **7.5. Reporting Requirements**

- 7.5.1. Reserved.

## **7.6. Compliance Plan**

- 7.6.1. N/A

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900006-2022**  
Application Received: **August 31, 2021**  
Plant Identification Number: **03-054-10900006**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **302 South Jefferson Street, Roanoke, VA 24011**

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Physical Location:	Pineville, Wyoming County, West Virginia
UTM Coordinates:	456.10 km Easting • 4,155.40 km Northing • Zone 17
Directions:	At Pineville, take Route 10 South approximately one mile, turn right onto Route 16 South, travel approximately one mile before turning left onto Pinnacle Creek Road and the facility will be located on the right side of the road.

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### Facility Description

The facility is a coal preparation plant which processes raw coal from an underground bituminous coal mine plus other raw coal sources. The preparation involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, low sulfur coal product. Operations at the plant include breaking, crushing, handling, screening, washing, and drying. The facility is characterized by SIC code 1222.

## Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Carbon Monoxide (CO)	178	0.00
Nitrogen Oxides (NO <sub>x</sub> )	333	0.00
Particulate Matter (PM <sub>2.5</sub> )	168	1.61
Particulate Matter (PM <sub>10</sub> )	355	9.88
Total Particulate Matter (TSP)	744	26.44
Sulfur Dioxide (SO <sub>2</sub> )	178	0.00
Volatile Organic Compounds (VOC)	186	0.00
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions <sup>1</sup>
Benzene	2.33	0.00
Hexane	4.66	0.00
Hydrochloric acid	8.01	0.00
Aggregate HAPs <sup>2</sup>	17.62	0.0034

<sup>1</sup> The 2020 actual emissions are from the State and Local Emissions Inventory System (SLEIS). Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and have not operated since 2017. The actual emissions from 2020 are from coal being trucked to the facility and then transferred to the railcar loadout for shipment.

<sup>2</sup> The actual aggregate HAPs is the sum of the specific HAPs listed in the 2020 SLEIS report.

## Title V Program Applicability Basis

This facility has the potential to emit 178 tpy of CO, 333 tpy of NO<sub>x</sub>, 355 tpy of PM<sub>10</sub>, 178 tpy of SO<sub>2</sub>, and 186 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pinnacle Mining Company, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Coal Preparation and Handling Operations
	45CSR6	Open burning prohibited.
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction/Modification
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Y	Coal Preparation Plants
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2183K	April 28, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

- Title V Boiler Plate Changes.** In Section 2.11.4., the reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.  
  
In Section 2.22.1., the reference notation was changed to delete 45CSR38 because it has been repealed.  
  
In Section 3.5.3., the contact information for EPA was updated.
- Miscellaneous Revision.** In Section 3.7.3. in the third row titled 40 C.F.R. Part 64, the first sentence under Rationale was updated because this is now the fourth renewal for this facility.
- Particulate Matter Stack Testing of Thermal Dryer.** Condition 4.3.5. of the current Title V permit required PM stack testing of the thermal dryer TD1 no later than September 26, 2017. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

4. **Miscellaneous Revision.** In the Example Data Form Attachments, the Title V permit number suffix has been updated from 2017 to 2022 in Attachments A through D.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Regulation	Rationale
45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009.
40 C.F.R. Part 64	<p>This is the fourth permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the second renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows:</p> <p>Cyclones (001-01A &amp; 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-02A, 001-02B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee’s calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p> <p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p>

### Request for Variances or Alternatives

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: (Date of Notice Publication)  
Ending Date: (Publication Date PLUS 30 Days)

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Daniel P. Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41902  
[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not Applicable.





Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Re: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal**

1 message

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**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Mon, May 23, 2022 at 11:08 PM

Carrie,

Here is the notice. Let me know if you need anything else or have any questions.

Dan

On Mon, May 23, 2022 at 4:15 PM McCumbers, Carrie &lt;carrie.mccumbers@wv.gov&gt; wrote:

Will you send me the notice too?

Thanks,  
Carrie

On Mon, May 23, 2022 at 8:01 AM Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt; wrote:

Carrie,

Hey. I have attached the draft/proposed fact sheet and permit for the above referenced facility. Please review them and let me know if you have any comments or questions.

I will stop by or call to talk about the proposed stack testing language that has been incorporated.

Thanks,  
Dan**notice of comment period.docx**

20K

## **NOTICE OF COMMENT PERIOD FOR DRAFT/PROPOSED OPERATING PERMIT RENEWAL**

Title V of the Federal Clean Air Act and the state Air Pollution Control Act requires that all major sources and certain minor sources have a permit to operate which states all requirements (e.g. emission limitations, monitoring requirements, etc.) established by regulations promulgated under the aforementioned programs. The Division of Air Quality (DAQ) has determined that the draft/proposed permit renewal referenced herein meets this requirement.

The DAQ is providing notice to the general public of its preliminary determination to issue an operating permit renewal to the following company for operation of the referenced natural gas transmission facility:

Pinnacle Mining Company, LLC  
Pinnacle Preparation Plant  
Plant ID No.: 109-00006  
Pinnacle Creek Road  
Pineville, WV 24874

This notice solicits comments from the public and affected state(s) concerning the above preliminary determination and provides an opportunity for such parties to review the basis for the proposed approval and the "draft" permit renewal. This notice also solicits comments from the U.S. EPA concerning the same preliminary determination and provides an opportunity for the U.S. EPA to concurrently review the basis for the proposed approval as a "proposed" permit.

All written comments submitted by the public and affected state(s) pursuant to this notice must be received by the DAQ within thirty (30) days of the date of publication of this notice. Under concurrent review, written comments submitted by the U.S. EPA must be received by the DAQ within forty-five (45) days from the date of publication of this notice or from the date the U.S. EPA receives this draft/proposed permit renewal, whichever is later. In the event the 30th/45th day is a Saturday, Sunday, or legal holiday, the comment period will be extended until 5:00 p.m. on the following regularly scheduled business day. The public shall have 135 days from the date of publication of this notice to file petitions for concurrently reviewed permits. Upon notice by the U.S. EPA to the DAQ, prior to the end of the 45 day notice period, the U.S. EPA may choose to hold the 30 day comment period on the draft permit and the 45 day comment period on the proposed permit sequentially. During the public comment period any interested person may submit written comments on the draft permit and, if no public hearing has been scheduled, may request a public hearing. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Director of the DAQ shall grant such a request for a hearing if she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located, after 30 day notice is given. The DAQ will consider all written comments prior to final action on the permit.

Copies of the Permit Application, DAQ Fact Sheet, and Draft/Proposed Permit Renewal may be downloaded from the DAQ's web site at:  
<https://dep.wv.gov/daq/permitting/titlevpermits/Pages/default.aspx>.

Comments and questions concerning this matter should be addressed to:

WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Contact: Dan Roberts  
(304) 926-0499 ext.: 41902



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

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**Re: Pinnacle Mining Company, LLC - Pinnacle Preparation Plant - R30-10900006-2022 renewal**

1 message

---

**Roberts, Daniel P** <daniel.p.roberts@wv.gov>  
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Mon, May 23, 2022 at 11:10 PM

Here are the attachments too.

Dan

On Mon, May 23, 2022 at 11:08 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:  
Carrie,

Here is the notice. Let me know if you need anything else or have any questions.

Dan

On Mon, May 23, 2022 at 4:15 PM McCumbers, Carrie <carrie.mccumbers@wv.gov> wrote:  
Will you send me the notice too?

Thanks,  
Carrie

On Mon, May 23, 2022 at 8:01 AM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:  
Carrie,

Hey. I have attached the draft/proposed fact sheet and permit for the above referenced facility. Please review them and let me know if you have any comments or questions.

I will stop by or call to talk about the proposed stack testing language that has been incorporated.

Thanks,  
Dan

---

 **Attachments 2022.docx**  
303K

Attachment A - Example Data Form

**MONTHLY PROCESSING RATE REPORT<sup>(1)</sup>**

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant

Permit No. R30-10900006-20~~17~~ 22

Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Raw Coal		Clean Coal			Coal Fines
	No. 50 Mine	Wet Wash Preparation Plant	Thermal Dryer Circuit	Loaded to Railroad Car	Loaded from ST-13 to Truck	Coal and/or Coal Fines to Conveyor RC-5
	(Ton/Day)	(Ton/Day)	(Ton/Day)	(Ton/Day)	(Ton/Day)	(Ton/Day)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
Total Ton/month						
Twelve Month Rolling Total <sup>(2)</sup>						

- Note: (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of no less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.
- (2) The Twelve Month Rolling Total shall mean the sum of the amount of coal received, processed, or shipped at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted operating rates shall not exceed the values listed in permit condition 5.1.1.

Attachment B - Example Data Form

**MONTHLY DELIVERY RATE REPORT FROM OUTSIDE SUPPLIERS<sup>(1)</sup>**

Pinnacle Mining Company, LLC  
Pinnacle Preparation Plant  
Permit No. R30-10900006-20~~17~~ 22  
Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Delivered To Stockpile:	Amount Delivered (tons)	Twelve Month Rolling Total <sup>(2)</sup>
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

- Note:
- (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of no less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.
  - (2) The Twelve Month Rolling Total shall mean the sum of the amount of coal received, processed, or shipped at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted delivery rates shall not exceed the values listed in permit condition 6.1.1.

Attachment C - Example Data Form

**MONTHLY TRANSFER RATE REPORT<sup>(1)</sup>**

Pinnacle Mining Company, LLC  
Pinnacle Preparation Plant  
Permit No. R30-10900006-20~~17~~ 22  
Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Transferred From Stockpile:	Transferred To Stockpile:	Amount Transferred (tons)	Twelve Month Rolling Total <sup>(2)</sup>
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
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24				
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30				
31				

- Note: (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of no less than five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.
- (2) The Twelve Month Rolling Total shall mean the sum of the amount of coal transferred at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted transfer rates shall not exceed the values listed in permit condition 6.1.2.

Attachment D - Example Data Form

**MONTHLY REFUSE STORAGE (ST-12) REPORT**

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant

Permit No. R30-10900006-20~~17~~ 22

Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Amount in Storage - Start of Day (tons) <sup>(1)</sup>	Transferred To Stockpile (tons):	Transferred From Stockpile (tons):	Amount in Storage - End of Day (tons)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
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21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				

Note: (1) The amount in storage at the start of the day should equal the amount in storage at the end of the preceding day.

## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true and correct to the best of my knowledge and that all reasonable efforts have been made to provide the most comprehensive information possible.

Name (Type or Print): \_\_\_\_\_

Signature<sup>1</sup>: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Fax No.: \_\_\_\_\_

\_\_\_\_\_

<sup>1</sup>This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or (ii) the delegation of authority to such representative is approved in advance by the Secretary;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Secretary.





Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

## WV DAQ Title V Permit Renewal Application Complete for Pinnacle Mining Company, LLC's Pinnacle Preparation Plant Facility

1 message

Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

Mon, Nov 1, 2021 at 5:10 PM

To: bill.johnson@bluestone-coal.com

Cc: jason.little@bluestone-coal.com, donna.toler@suddenlink.net, "McCumbers, Carrie" &lt;Carrie.McCumbers@wv.gov&gt;

RE: Application Status: Complete

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant Facility

Permit Renewal Application R30-10900006-2021

Mr. Johnson,

Your Title V renewal application for a permit to operate the above referenced facility was received by this Division on August 31, 2021. After review of said application, it has been determined that the application is administratively complete as submitted. Therefore, the above referenced facility qualifies for an Application Shield.

**The applicant has the duty to supplement or correct the application.** Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

The submittal of a complete application shall not affect the requirement that any source have all **preconstruction permits** required under the rules of the Division.

If during the processing of this application it is determined that additional information is necessary to evaluate or take final action on this application, a request for such information will be made in writing with a reasonable deadline for a response. Until which time as your renewal permit is issued or denied, please continue to operate this facility in accordance with 45CSR30, section 6.3.c. which states: *If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.* This protection shall cease to apply if, subsequent to the completeness determination made pursuant to paragraph 6.1.d. of 45CSR30 and as required by paragraph 4.1.b., the applicant fails to submit by the deadline specified in writing any additional information identified as being needed to process the application.

Please remember, **failure of the applicant to timely submit information required or requested to process the application may cause the Application Shield to be revoked.** Should you have any questions regarding this determination, please call me at (304)926-0499 ext. 41902.

Sincerely,

Daniel P. Roberts

WV Department of Environmental Protection

Division of Air Quality

(304) 926-0499 ext. 41902

[Daniel.p.roberts@wv.gov](mailto:Daniel.p.roberts@wv.gov)



Roberts, Daniel P <daniel.p.roberts@wv.gov>

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## Re: Pinnacle Mining application from Donna Toler

1 message

---

**McCumbers, Carrie** <carrie.mccumbers@wv.gov>  
To: "Mink, Stephanie R" <stephanie.r.mink@wv.gov>  
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

Thu, Sep 2, 2021 at 1:27 PM

Stephanie,

Please assign this renewal to Dan as R30-10900006-2021.

Thanks,  
Carrie

On Thu, Sep 2, 2021 at 8:12 AM Mink, Stephanie R <[stephanie.r.mink@wv.gov](mailto:stephanie.r.mink@wv.gov)> wrote:

Once I had my internet back I went in and assembled Donna's application into one document so you can scroll through it instead of going through the separate attachments. I left them marked as unread in the permitting mailbox. Here's where I saved it since the full version is too large to email; once it's assigned I'll send a link to whoever gets it so they can access it.

Q:\AQ Permitting\C\_McCumbers

--

**Stephanie Mink**

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57<sup>th</sup> Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

---

**Re: Pinnacle Mining application from Donna Toler**

1 message

---

**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>  
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

Thu, Sep 2, 2021 at 1:35 PM

I'll add the certificate from Donna and get this entered and forwarded to Dan shortly.

thanks  
Stephanie

On Thu, Sep 2, 2021 at 1:27 PM McCumbers, Carrie <carrie.mccumbers@wv.gov> wrote:  
Stephanie,

Please assign this renewal to Dan as R30-10900006-2021.

Thanks,  
Carrie

On Thu, Sep 2, 2021 at 8:12 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

Once I had my internet back I went in and assembled Donna's application into one document so you can scroll through it instead of going through the separate attachments. I left them marked as unread in the permitting mailbox. Here's where I saved it since the full version is too large to email; once it's assigned I'll send a link to whoever gets it so they can access it.

Q:\AQ Permitting\C\_McCumbers  
--

**Stephanie Mink**

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57<sup>th</sup> Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

**Roberts, Daniel P** <daniel.p.roberts@wv.gov>

---

**Pinnacle Mining renewal**

1 message

---

**Mink, Stephanie R** <stephanie.r.mink@wv.gov>  
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

Thu, Sep 2, 2021 at 2:18 PM

Hi Dan,

Here's the info sheet for Pinnacle. The application is very large and can't be emailed so I have saved it in your folder on the Q drive here:

Q:\AQ Permitting\D\_rober\Pinnacle Mining renewal

It has also been indexed in AX so you can save it wherever you want it. I'm ready to send the confirmation email now too.

Have a great day!

--

**Stephanie Mink**

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57<sup>th</sup> Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

**R30-10900006-2021 info sheet.pdf**  
69K

WV SEAL image  
removed

**Permit / Application Information Sheet**  
**Division of Environmental Protection**  
**West Virginia Office of Air Quality**

<b>Company:</b>	Pinnacle Mining Company, LLC		<b>Facility:</b>	Pineville	
<b>Region:</b>	5	<b>Plant ID:</b>	109-00006	<b>Application #:</b>	R30-10900006-2021
<b>Engineer:</b>	Roberts, Dan			<b>Category:</b>	Coal
<b>Physical Address:</b>	Pinnacle Creek Road Pineville WV 24874			<b>SIC:</b> [1222] COAL MINING - BITUMINOUS COAL & LIGNITE - UNDERGROUND <b>NAICS:</b> [212112] Bituminous Coal Underground Mining	
<b>County:</b>	Wyoming			<b>SIC:</b> [1221] COAL MINING - BITUMINOUS COAL & LIGNITE - SURFACE <b>NAICS:</b> [212111] Bituminous Coal and Lignite Surface Mining	
<b>Other Parties:</b>	ENV_CONT - Little, Jason 540-314-0115 PROJ MGR - Toler, Donna 304-752-8320				

**Information Needed for Database and AIRS**

1. Need valid physical West Virginia address with zip

**Regulated Pollutants**

**Summary from this Permit R30-10900006-2021**

Air Programs		Applicable Regulations
Fee Program	Fee	Application Type
	\$0.00	RENEWAL

**Notes from Database**

**Activity Dates**

APPLICATION RECEIVED	08/31/2021
ASSIGNED DATE	09/02/2021

**NON-CONFIDENTIAL**

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 109-00006  
Company: Pinnacle Mining Company, LLC  
Printed: 09/02/2021  
Engineer: Roberts, Dan



Roberts, Daniel P &lt;daniel.p.roberts@wv.gov&gt;

---

**WV DAQ Title V Permit Application Status for Pinnacle Mining Company, LLC;  
Pinnacle Preparation Plant Facility**

1 message

**Mink, Stephanie R** <stephanie.r.mink@wv.gov>

Thu, Sep 2, 2021 at 2:18 PM

To: bill.johnson@bluestone-coal.com, jason.little@bluestone-coal.com, donna.toler@suddenlink.net

Cc: Daniel P Roberts &lt;daniel.p.roberts@wv.gov&gt;, Carrie McCumbers &lt;carrie.mccumbers@wv.gov&gt;

**RE: Application Status****Pinnacle Mining Company, LLC****Pinnacle Preparation Plant Facility****Facility ID No. 109-00006****Application No. R30-10900006-2021**

Dear Mr. Johnson,

Your application for a Title V Permit Renewal for Pinnacle Mining Company, LLC's Pinnacle Preparation Plant Facility was received by this Division on August 31, 2021, and was assigned to Dan Roberts.

Should you have any questions, please contact the assigned permit writer, Dan Roberts, at 304-926-0499, extension 41902, or [Daniel.P.Roberts@wv.gov](mailto:Daniel.P.Roberts@wv.gov).

--

**Stephanie Mink**

Secretary 2

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57<sup>th</sup> Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

---

3413 Old Logan Road  
Logan, WV 25601

Phone (304) 752-8320

August 30, 2021

Received  
August 31, 2021  
WV DEP/Div of Air Quality

Ms. Laura Crowder, Director  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

RE: Pinnacle Mining Company, LLC  
Title V Renewal Application  
ID# 109-00006

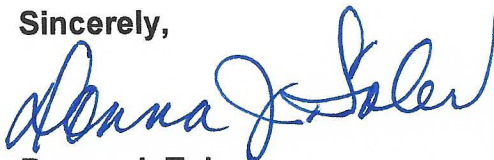
Dear Ms. Crowder:

On behalf of Pinnacle Mining Company, LLC, I am submitting the enclosed Title V Renewal Application for the Pinnacle Preparation Plant Facility for your review and approval.

Pinnacle Mining Company has made no physical or operational changes to the Pinnacle Preparation Plant since the issuance of the current Title V permit in January 2017 that would trigger any WVDAQ or federal air regulatory requirement that is not included in the current permit. The Pinnacle Plant should not be subjected to any new WVDAQ or federal air quality rules that would necessitate new or revised permit rules.

If additional information or clarification is needed, please contact me at the Logan address listed above or call 304-752-8320.

Sincerely,



Donna J. Toler  
Air Quality Project Manager

donna.toler@suddenlink.net





**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION**

**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: (304) 926-0475

[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

Received  
August 31, 2021  
WV DEP/Div of Air Quality

**INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS**

*Section 1: General Information*

<b>1. Name of Applicant (As registered with the WV Secretary of State's Office):</b>	<b>2. Facility Name or Location:</b>
<b>3. DAQ Plant ID No.:</b>  _____	<b>4. Federal Employer ID No. (FEIN):</b>
<b>5. Permit Application Type:</b>  <input type="checkbox"/> Initial Permit                      When did operations commence? <input type="checkbox"/> Permit Renewal                      What is the expiration date of the existing permit? <input type="checkbox"/> Update to Initial/Renewal Permit Application	
<b>6. Type of Business Entity:</b>  <input type="checkbox"/> Corporation <input type="checkbox"/> Governmental Agency <input type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Partnership	<b>7. Is the Applicant the:</b>  <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Both  If the Applicant is not both the owner and operator, please provide the name and address of the other party.
<b>8. Number of onsite employees:</b>	
<b>9. Governmental Code:</b>  <input type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> State government owned and operated; 2 <input type="checkbox"/> District government owned and operated; 5	
<b>10. Business Confidentiality Claims</b>  Does this application include confidential information (per 45CSR31)? <input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY" guidance.	

<b>11. Mailing Address</b>		
<b>Street or P.O. Box:</b>		
<b>City:</b>	<b>State:</b>	<b>Zip:</b> -
<b>Telephone Number:</b> ( ) -	<b>Fax Number:</b> ( ) -	

<b>12. Facility Location</b>		
<b>Street:</b>	<b>City:</b>	<b>County:</b>
<b>UTM Easting:</b> km	<b>UTM Northing:</b> km	<b>Zone:</b> <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<b>Directions:</b>		
<b>Portable Source?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Is facility located within a nonattainment area?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, for what air pollutants?</b>	
<b>Is facility located within 50 miles of another state?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, name the affected state(s).</b>	
<b>Is facility located within 100 km of a Class I Area<sup>1</sup>?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No  <b>If no, do emissions impact a Class I Area<sup>1</sup>?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, name the area(s).</b>	
<sup>1</sup> Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

<b>13. Contact Information</b>		
<b>Responsible Official:</b>		<b>Title:</b>
<b>Street or P.O. Box:</b>		
<b>City:</b>	<b>State:</b>	<b>Zip:</b> -
<b>Telephone Number:</b> ( ) -	<b>Fax Number:</b> ( ) -	
<b>E-mail address:</b>		
<b>Environmental Contact:</b>		<b>Title:</b>
<b>Street or P.O. Box:</b>		
<b>City:</b>	<b>State:</b>	<b>Zip:</b> -
<b>Telephone Number:</b> ( ) -	<b>Fax Number:</b> ( ) -	
<b>E-mail address:</b>		
<b>Application Preparer:</b>		<b>Title:</b>
<b>Company:</b>		
<b>Street or P.O. Box:</b>		
<b>City:</b>	<b>State:</b>	<b>Zip:</b> -
<b>Telephone Number:</b> ( ) -	<b>Fax Number:</b> ( ) -	
<b>E-mail address:</b>		

**14. Facility Description**

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC

**Provide a general description of operations.**

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**.

For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

<b>18. Applicable Requirements Summary</b>	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO <sub>x</sub> Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO <sub>2</sub> Trading Program (45CSR41)	

<b>19. Non Applicability Determinations</b>
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p>
<input type="checkbox"/> Permit Shield

**19. Non Applicability Determinations (Continued)** - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

☐

Permit Shield

## 20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

☐ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? ☐ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

**20. Facility-Wide Applicable Requirements (*Continued*) - Attach additional pages as necessary.**

**List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.**

☐ Permit Shield

**For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

**Are you in compliance with all facility-wide applicable requirements?** ☐ Yes ☐ No

**If no, complete the Schedule of Compliance Form as ATTACHMENT F.**



## 21. Active Permits/Consent Orders

[illegible]

## 22. Inactive Permits/Obsolete Permit Conditions

[illegible]

**Section 3: Facility-Wide Emissions**

<b>23. Facility-Wide Emissions Summary [Tons per Year]</b>	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	
Nitrogen Oxides (NO <sub>x</sub> )	
Lead (Pb)	
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	
Total Particulate Matter (TSP)	
Sulfur Dioxide (SO <sub>2</sub> )	
Volatile Organic Compounds (VOC)	
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
Regulated Pollutants other than Criteria and HAP	Potential Emissions

<sup>1</sup>PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.  
<sup>2</sup>For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

**Section 4: Insignificant Activities**

<b>24. Insignificant Activities (Check all that apply)</b>	
<input type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO <sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.
<input type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	<p>19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO<sub>x</sub>, SO<sub>2</sub>, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:</p>

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input type="checkbox"/>	26. Fire suppression systems.
<input type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

**Section 5: Emission Units, Control Devices, and Emission Points**

<b>25. Equipment Table</b>
Fill out the <b>Title V Equipment Table</b> and provide it as <b>ATTACHMENT D</b> .
<b>26. Emission Units</b>
For each emission unit listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Emission Unit Form</b> as <b>ATTACHMENT E</b> .
For each emission unit not in compliance with an applicable requirement, fill out a <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .
<b>27. Control Devices</b>
For each control device listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Air Pollution Control Device Form</b> as <b>ATTACHMENT G</b> .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as <b>ATTACHMENT H</b> .

**Section 6: Certification of Information**

**28. Certification of Truth, Accuracy and Completeness and Certification of Compliance**

**Note:** *This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.*

**a. Certification of Truth, Accuracy and Completeness**

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

**b. Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

**Responsible official (type or print)**

Name: **Bill Johnson**

Title: **POA**

**Responsible official's signature:**

Signature: 

Signature Date: **9-2-2021**

(Must be signed and dated in blue ink)

**Note: Please check all applicable attachments included with this permit application:**

- |                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | ATTACHMENT A: Area Map                                      |
| <input checked="" type="checkbox"/> | ATTACHMENT B: Plot Plan(s)                                  |
| <input checked="" type="checkbox"/> | ATTACHMENT C: Process Flow Diagram(s)                       |
| <input checked="" type="checkbox"/> | ATTACHMENT D: Equipment Table                               |
| <input checked="" type="checkbox"/> | ATTACHMENT E: Emission Unit Form(s)                         |
| <input type="checkbox"/>            | ATTACHMENT F: Schedule of Compliance Form(s)                |
| <input checked="" type="checkbox"/> | ATTACHMENT G: Air Pollution Control Device Form(s)          |
| <input checked="" type="checkbox"/> | ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s) |

**All of the required forms and additional information can be found and downloaded from, the DEP website at [www.dep.wv.gov/dag](http://www.dep.wv.gov/dag), requested by phone (304) 926-0475, and/or obtained through the mail.**



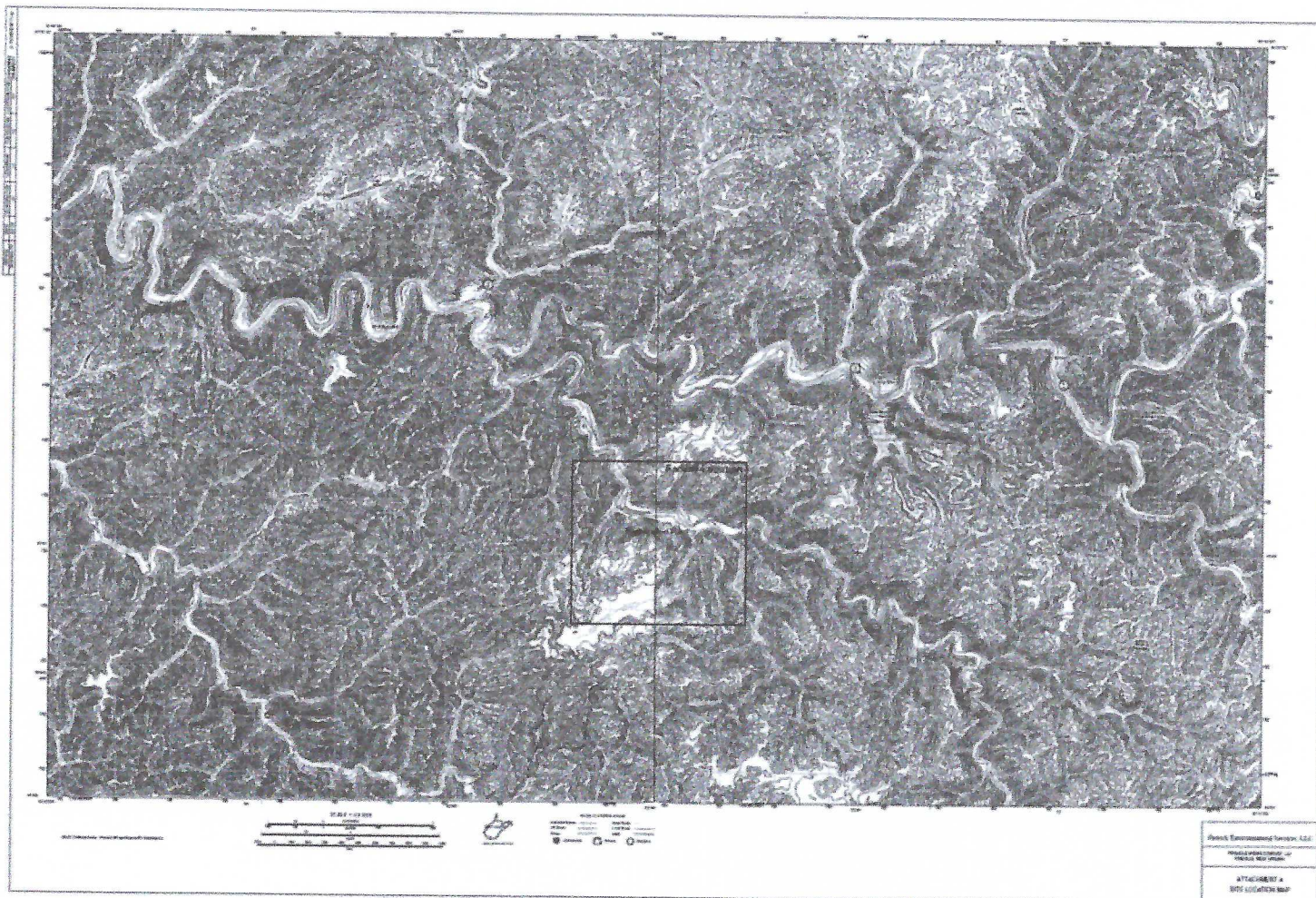
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ATTACHMENT A

AREA MAP



ATTACHMENT B  
PLOT PLANS

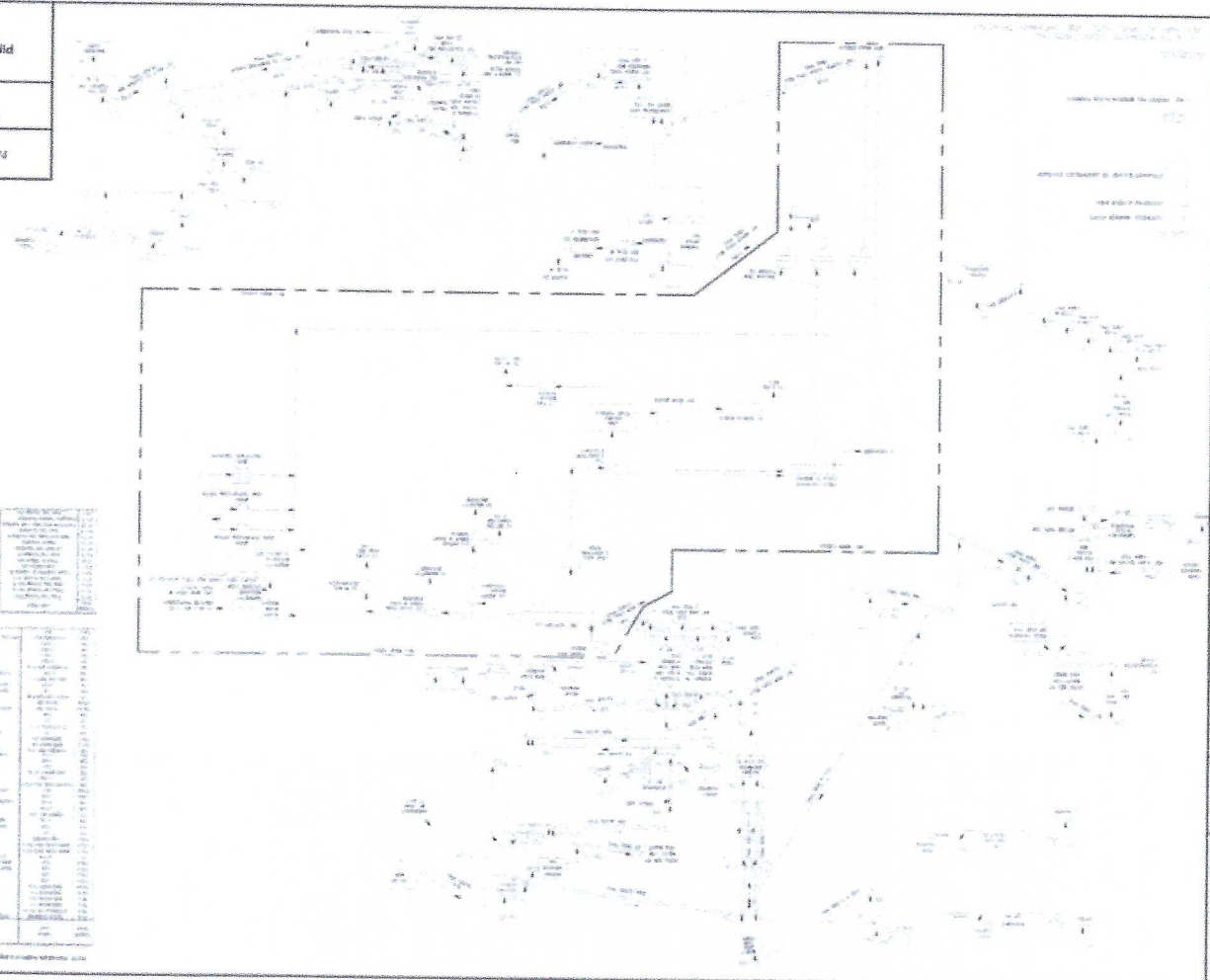






PROCESS FLOW DIAGRAMS

ATTACHMENT C



Pinnacle Preparation Plant  
 Pinnacle Mining Company, LLC  
 Pinnacle Creek Rd.  
 Pinnacle, WV 26424  
 Pinnacle Engineering Services, LLC

Equipment	Capacity	Power	Notes
1. Primary Crusher	1000 TPD	150 HP	Feeds from Stockpile 1
2. Secondary Crusher	800 TPD	120 HP	Feeds from Primary Crusher
3. Tertiary Crusher	600 TPD	100 HP	Feeds from Secondary Crusher
4. Ball Mill	500 TPD	200 HP	Feeds from Tertiary Crusher
5. Rod Mill	400 TPD	180 HP	Feeds from Ball Mill
6. Classifier	300 TPD	50 HP	Feeds from Rod Mill
7. Storage Bin	200 TPD	0 HP	Feeds from Classifier
8. Conveyor	100 TPD	10 HP	Feeds from Storage Bin
9. Stockpile	500 TPD	0 HP	Feeds from Conveyor
10. Discharge	100 TPD	0 HP	Feeds from Stockpile



EQUIPMENT TABLE

ATTACHMENT D

**ATTACHMENT D - Title V Equipment Table**  
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID <sup>1</sup>	Control Device <sup>1</sup>	Emission Unit ID <sup>1</sup>	Emission Unit Description	Design Capacity	Year Installed/Modified
--------------------------------	-----------------------------	-------------------------------	---------------------------	-----------------	-------------------------

See Attachment f

[illegible]

For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S, ... or other appropriate designation for emission units; 1C, 2C, 3C, ... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E

EMISSION UNIT FORMS

## ATTACHMENT E - Emission Unit Form

### Emission Unit Description

Emission unit ID number: TD1	Emission unit name: Thermal Dryer	List any control devices associated with this emission unit:  2 Cyclones 2 Venturi Scrubbers
---------------------------------	--------------------------------------	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
McNally fluidized bed thermal dryer used to reduce the moisture content of clean coal exiting the wash circuit by contacting the wet coal with hot combustion gases from the burning of pulverized coal, natural gas or methane.

Manufacturer: McNally	Model number: 10	Serial number: Not Known
Construction date: Not Known	Installation date: 1970	Modification date(s): 1996

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):  
800 tons/hr

Maximum Hourly Throughput: 800 tons/hr	Maximum Annual Throughput: 5,670,000 tons	Maximum Operating Schedule: 7083 hr/year
---	--	---

### Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it?  <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
Maximum design heat input and/or maximum horsepower rating: 225 million Btu/hr	Type and Btu/hr rating of burners: Two pulverized coal-fired burners with combined rating of 225 million Btu/hr

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.  
The dryer can use pulverized coal, natural gas, or methane alone or in combination. Information on fuel properties is presented for coal combustion only as this is the worst case pollutant emitting activity. Since no different applicable requirements apply to the different fuels, an alternative operating scenario was not applied.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Bituminous Coal	1.5 wt %	7.25 wt %	14,900 per lb



<i>Emissions Data – See Attachment I</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-5-3.1: 20% Opacity.

C.S.R. § 45-5-3.2: No more than 60% Opacity for more than 5 minutes during operation.

C.S.R. § 45-5-3.3: No More than 60% Opacity for more than 8 minutes during startup.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-5-3.1 thru 3.3: The permittee will conduct monitoring/recordkeeping/reporting for the thermal dryer as follows (C.S.R. § 45-30-5.1.c):

a. To determine compliance with the referenced opacity limits, the permittee will conduct daily visual emission observations in accordance with Method 22 of 40 C.F.R. 60, Appendix A for the thermal dryer. These observations will be conducted during periods of normal facility operation for sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee will conduct an opacity evaluation in accordance with 40 C.F.R. 60, Appendix A, Method 9, within 24 hours. A 40 C.F.R. 60, Appendix A, Method 9 evaluation will not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.

b. The thermal dryer will be observed visually during periods of building a fire of operating quality and minimization efforts taken to ensure particulate matter emissions of sixty percent (60%) opacity for a period of up to 8 minutes in any operating day is not exceeded during such activities.

c. A record of each visible emissions observation will be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record will include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer, any maintenance and corrective measures taken. Records will be maintained on site for a period of no less than five (5) years C.S.R. § 45-30-5.1.c.



### Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-5-4.1.b, C.S.R. § 45-5-Appendix 1.2: Maximum allowable particulate loading shall not exceed 0.083 grains per cubic foot.

### X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-5-4.1.b, C.S.R. § 45-5 Appendix 1.2:

Particulate testing was conducted in 2007 to establish CAM parameter indicator ranges.

Subsequent testing to determine compliance with the particulate loading limitations of C.S.R. § 45-5-4.1.b and C.S.R. § 45-5 Appendix 1.2 will be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Initial	≤50% of particulate loading limit	Once/5 years
Initial	Between 50% and 90 % of particulate loading limit	Once/3 years
Initial	≥90% of particulate loading limit	Annual
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50% and 90 % of particulate loading limit	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates ≤50% of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates ≤50% of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate ≥90% of particulate loading limit	Annual
Once/5 years	If testing is required once /5 years and any test indicates mass emission rates between 50% and 90 % of particulate loading limit	Once/3 years
Once/5 years	If testing is required once/5 years and any test indicates a mass emission rate ≥90% of particulate loading limit	Annual

The permittee will perform parameter monitoring as outlined in the CAM Plan submitted to WVDAQ in 2006 and incorporated into the current Title V permit (see Attachment H). 45CSR§30-5.1.c.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-5-4.2: Adding additional gas to dryer exhaust for circumventing rules prohibited.

C.S.R. § 45-5-4.3: Stack Height > 80 ft. or > 10 ft. from adjacent structure.

C.S.R. § 45-5-4.1.b., C.S.R. § 45-5-Appendix 2.1, 2.2, 2.3 (Permit 2183K Specific Requirement A.5): Continuously measure temperature, pressure drop in the scrubber, and pressure of water supply for scrubber, and maintain water flow equal to or greater than 2,240 gpm.

C.S.R. § 45-10-4.1 (Permit 2183K, Specific Requirement B.3): Maximum allowable sulfur dioxide (SO<sub>2</sub>) loading 2000 ppm.

C.S.R. § 45-10-8.1.a, 1.b, 2.a, 2.b: Secretary may require SO<sub>2</sub> monitoring device; permittee shall perform calculation based on fuel sulfur content basis and conduct compliance testing; and Secretary may conduct emission testing.

C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.2): The dryer shall not be operated more than 7083 hours per year.

C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.3): Permittee shall sample the dryer fuel coal daily for Btu and sulfur analysis.

☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-5-4.2: None required.

C.S.R. § 45-5-4.3: Determined by inspection.

C.S.R. § 45-5-1.b., C.S.R. § 45-5-Appendix 2.1, 2.2, 2.3 (Permit 2183K, Specific Requirement A.5) and C.S.R. § 45-10-4.1 and C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.3): The permittee has implemented a WVDAQ approved CAM Plan that incorporates provisions for demonstrating compliance with these requirements.

C.S.R. § 45-10-8.1.a, 1.b, 2.a, 2.b: None Required.

C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.2): The permittee will maintain daily records of the coal throughput and the hours of operation of the thermal dryer. A rolling yearly total will mean the sum of coal throughput at any given time for the previous twelve (12) months. These records will be maintained on site for a period of no less than five (5) years. C.S.R. 45-30-5.1.c.



### *Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.4): Emissions from the thermal dryer shall not exceed the following hourly and annual limits:

Pollutant	Emissions Limitations	
	One-Hour Average (lb/hour)	Annual (ton/year)
Volatile Organic Compounds (VOCs)	41.3	146
SO <sub>2</sub>	50.3	178
NO <sub>x</sub>	93.9	332
CO	50.3	178
Particulate Matter (PM)	77.0	272

C.S.R. § 45-13 (Permit 2183K, Specific Requirement B.1): Permittee shall document scrubber malfunctions.

### ☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit 2183K, Specific Requirement A.4): The permittee will use the same compliance demonstration methods as described above for the applicable requirement C.S.R. § 45-5-4.1.b, C.S.R. § 45-5-Appendix 1.2.

C.S.R. § 45-13 (Permit 2183K, Specific Requirement B.1): The permittee will use the same compliance demonstration methods as described above for the applicable requirement C.S.R. § 45-5-4.1.b., C.S.R. § 45-5-Appendix 2.1, 2.2, 2.3, and Permit 2183K, Specific Requirement A.5.

<p><b><i>Applicable Requirements</i></b></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>40 C.F.R Part 64: Compliance Assurance Monitoring (CAM) Plan to address particulate and SO<sub>2</sub> emissions from thermal dryer.</p>
<p>X Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>40 C.F.R Part 64: A CAM plan has been approved by WVDAQ for the thermal dryer and incorporated into the current Title V permit (See Attachment H).</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>



## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> T4-1 through T135	<b>Emission unit name:</b> Transfer Operations	<b>List any control devices associated with this emission unit:</b> See Attachment J
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
These emission units are listed in Attachment J and include all the transfer operations of raw coal, clean coal, and refuse that generate fugitive particulate emissions. These include conveyor-to-conveyor transfers, conveyor-to-storage pile/silo, and storage pile/silo-to-conveyor transfers. The transfer of material associated with bins, hoppers, pits, truck dumping and end loader dumping also are included in this application as part of this group. Information requested below for these emission units is presented in Attachment J to the extent it is known.

<b>Manufacturer:</b> Not Known	<b>Model number:</b> Not Known	<b>Serial number:</b> Not Known
<b>Construction date:</b> Not Known	<b>Installation date:</b> See Attachment J	<b>Modification date(s):</b> See Attachment J

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):** See Attachment J

<b>Maximum Hourly Throughput:</b> See design capacity listed in Attachment J	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b>
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> ___ Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**



### Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-5-3.1: 20% opacity limit. Applies only to scrubber stacks for Mixer 120(T16, T17 & T18) and C139(T20).

C.S.R. § 45-5-3.2: No more than 60% Opacity for no more than 5 minutes during any 60 minute period of operation. Applies only to scrubber stacks for Mixer 120(T16, T17 & T18) and C139 (T20).

40 C.F.R. § 60.254(a), 60.11(c): 20% Opacity. This New Source Performance Standard requirement applies only to the following transfer operations (transfer points are given in parenthesis):

Transfer Points [emission point ID(s): Truck Dumping [at ST-10 and (T4-8), DH-3(T93)]; Endloader [at OS-1 (T92), ST-2 (T77, T100, and T113), ST-10 (T105), ST-11 (T102), ST-13 (T119), ST-14 (T104), ST-16 (T135), DH-3 (T94), DHRC-4(T124)]; Bins/Hoppers [Rail Car Loading Bin ST-6 (T25 and T26), ST-10(T4-9), DH-3 (T95), Mine Car Dump MCD-1 (T72A and T72B)]; Conveyors [C24 (T10-1, T10-2 and T10-3), C31 (T10-4), C31A (T11), C36 Feeder (T12-3), C118 (T16), SC-1 (T19-B), C139 (T21), ST-13 Reclaim System (T22), RC-1 (T23), C141 (T24), C152 (T25), ST-6 Reclaim System (T26), S3A (T111 and T112), S7 (T29), ST-11 Reclaim System (T32), S3 (T33), S3B (T34), C128-3 (T42), C128-4 (T43), 8A (T46-2), S5 (T49), S10 (T50), RCT-1 (T52), C11-4 (T73, T74), RC-5 (T81), C10-3 (T96), C128-5 (T44), C128-6 (T121), C120 (T127A, T127B), C121 (T128, T129), C122 (T130)]; Breaker [S6 (T27-5, and T28-3)]; Screen [SS-1 (T51, T53, and T54)].

### X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-5-3.1, C.S.R. § 45-5-3.2, and 40 C.F.R. § 60.254(a), 60.11(c): The permittee will conduct monitoring/recordkeeping/reporting as follows (C.S.R. 45-30-5.1.c.) [Not required for stockpiles and haulroads – OS1, ST-14, ST-2, ST-11, ST-12, ST-13, ST-16, PRP, URP]:

a. To determine compliance with the referenced opacity limits, the permittee will conduct weekly visual emission observations in accordance with Method 22 of 40 C.F.R. 60, Appendix A for all coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems. These observations will be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee will conduct an opacity evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 9, within 24 hours. A 40 C.F.R. 60, Appendix A, Method 9, evaluation will not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.

b. A record of each visible emissions observation will be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record will include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records will be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken. C.S.R. 45-30-5.1.c.



**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

40 C.F.R. §60.11(d), 45CSR16, and 45CSR13, R13-2183 B.4.: Maintain and operate any affected facility including the air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. This New Source Performance Standard requirement applies only to the following transfer operations (transfer points are given in parenthesis):

Transfer Points [emission point ID(s): Truck Dumping [at ST-10 and (T4-8), DH-3(T93)]; Endloader [at OS-1 (T92), ST-2 (T77, T100, and T113), ST-10 (T105), ST-11 (T102), ST-13 (T119), ST-14 (T104), ST-16 (T135), DH-3 (T94), DHRC-4(T124)]; Bins/Hoppers [Rail Car Loading Bin ST-6 (T25 and T26), ST-10(T4-9), DH-3 (T95), Mine Car Dump MCD-1 (T72A and T72B)]; Conveyors [C24 (T10-1, T10-2 and T10-3), C31 (T10-4), C31A (T11), C36 Feeder (T12-3), C118 (T16), SC-1 (T19-B), C139 (T21), ST-13 Reclaim System (T22), RC-1 (T23), C141 (T24), C152 (T25), ST-6 Reclaim System (T26), S3A (T111 and T112), S7 (T29), ST-11 Reclaim System (T32), S3 (T33), S3B (T34), C128-3 (T42), C128-4 (T43), 8A (T46-2), S5 (T49), S10 (T50), RCT-1 (T52), C11-4 (T73, T74), RC-5 (T81), C10-3 (T96), C128-5 (T44), C128-6 (T121), C120 (T127A, T127B), C121 (T128, T129), C122 (T130)]; Breaker [S6 (T27-5, and T28-3)]; Screen [SS-1 (T51, T53, and T54)].

**X Permit Shield**

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which will be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

40 C.F.R. § 60.11(d): The permittee will inspect all fugitive dust control systems weekly to ensure that they are operated and maintained in conformance with their designs. The permittee will maintain records of all scheduled and non-scheduled maintenance. Records will be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken. C.S.R. 45-30-5.1.c.

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit 2183K, Specific Requirements A.6 & A.9): The following processing limits will not be exceeded for SS-1, C45, C100, and RC5:

Type of Material and Location Where Processed	Maximum Amount to be Processed (TPY)
Raw coal feed from No. 50 Mine to Scalping Screen (SS-1).	6,900,000
Raw coal feed to Wet Wash Circuit/Preparation Plant (1,500 ton/hr * 7.083 hr/yr).	10,630,000
Feed coal from Wash Circuit to Thermal Dryer (800 ton/hr * 7.083 hr/yr).	5,670,000
Trucked Coal and/or Coal Fines from Conveyor RC-5 to Conveyor RC-1	860,000
Clean coal/Coal Fines from Loading Bin ST-6 to railroad cars	8,100,000

**☒ Permit Shield**

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which will be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit 2183K, Specific Requirements A.6 & A.9): The permittee will maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments A through C of Permit 2183K which are presented in this application as Attachment K. Records will be certified by a "responsible official" and maintained on site for a period of not less than five (5) years and will be made available to the Secretary or his or her duly authorized representative upon request. C.S.R. 45-13 Permit No. R13-2183K, Specific Requirement B.6.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> B1	<b>Emission unit name:</b> Rock Crusher #6	<b>List any control devices associated with this emission unit:</b> Full Enclosure
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
 Receives refuse from the Rock Bin, crushes it and transfers it to the 36-inch Rock Belt Conveyor C8.

<b>Manufacturer:</b> McClanahan	<b>Model number:</b> 36X60 Rockmaster	<b>Serial number:</b> 1072-69
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1970	<b>Modification date(s):</b> N/A

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 280 tons/hr

<b>Maximum Hourly Throughput:</b> 280 tons/hr	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b> 8760 hrs
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> ___ Yes <u>X</u> No	<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

<p><i>Applicable Requirements</i></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>Only the Facility-wide requirements listed on the General Application Forms apply to these emission units.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>Only the Facility-wide requirements listed on the General Application Forms apply to these emission units.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> B2 & B3	<b>Emission unit name:</b> Rotary Breakers 13-1 & 13-2	<b>List any control devices associated with this emission unit:</b> Full Enclosure	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): These two identical emission units remove rocks from the raw coal and reduce coal lumps to a size that can be processed in the wash circuit. The information presented below is the same for each unit.			
<b>Manufacturer:</b> Pennsylvania Crusher	<b>Model number:</b> 9X22 RMS	<b>Serial number:</b> 3792-3793	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1970	<b>Modification date(s):</b> N/A	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> 1,000 tons/hr			
<b>Maximum Hourly Throughput:</b> 1,000 tons/hr	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b> 8760 hrs	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> ___ Yes <u>  X  </u> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

<p><i>Applicable Requirements</i></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>Only the Facility-wide requirements listed on the General Application Forms apply to these emission units.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>Only the Facility-wide requirements listed on the General Application Forms apply to these emission units.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> B4	<b>Emission unit name:</b> Breaker S6	<b>List any control devices associated with this emission unit:</b> Full Enclosure	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): This emission unit removes rocks from the raw coal and reduces coal lumps to a size that can be processed in the wash circuit.			
<b>Manufacturer:</b> Pennsylvania Crusher	<b>Model number:</b> 9X24	<b>Serial number:</b> Not Known	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1986	<b>Modification date(s):</b> N/A	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> 1,500 tons/hr			
<b>Maximum Hourly Throughput:</b> 1,500 tons/hr	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b> 8760 hrs	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> ___ Yes <u> X </u> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**

<p><i>Applicable Requirements</i></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>40 C.F.R. § 60.254(a), 60.11(c): 20% Opacity.</p> <p>40 C.F.R. §60.11(d), 45CSR16, and 45CSR13, R13-2183 B.4.: Maintain and operate any affected facility including the air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>40 C.F.R. § 60.254(a), 60.11(c): The permittee will conduct monitoring/recordkeeping/reporting as follows (C.F.R. 45-30-5.1.c.):</p> <p>a. To determine compliance with the referenced opacity limit, the permittee will conduct weekly visual emission observations in accordance with Method 22 of 40 C.F.R. 60, Appendix A for all coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems. These observations will be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee will conduct an opacity evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 9, within 24 hours. A 40 C.F.R. 60, Appendix A, Method 9, evaluation will not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.</p> <p>b. A record of each visible emissions observation will be maintained, including any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record will include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. Records will be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken. C.S.R. 45-30-5.1.c.</p> <p>40 C.F.R. § 60.11(d): The permittee will inspect all fugitive dust control systems weekly to ensure that they are operated and maintained in conformance with their designs. The permittee will maintain records of all scheduled and non-scheduled maintenance. Records will be maintained on site for a period of no less than five (5) years stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken. C.S.R. 45-30-5.1.c.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>



## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> OS-1	<b>Emission unit name:</b> Saw Mill Raw Coal Storage Pile	<b>List any control devices associated with this emission unit:</b> Minimize drop point	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> 5.05-acre raw coal storage pile that receives coal via dump truck. A front-endloader is used to move coal from Stockpile OS-1 to trucks for hauling to Stockpiles ST-2, ST-11, ST-13, ST-14, ST-15, ST-16 or Storage Pit ST-10.			
<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1998	<b>Modification date(s):</b> 1999, 2000, 2001, & 2002	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> 631,000 tons			
<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> 250,000 tons	<b>Maximum Operating Schedule:</b> 8760 hrs	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> ___ Yes <u>  X  </u> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**



### Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): The following storage and truck delivery limits shall not be exceeded as determined using a 12-month rolling total:

Stockpile/Bin ID No.	Material Stored	Maximum in Storage (tons)	Maximum to be Delivered (tons) <sup>1</sup>
Stockpile OS-1	raw coal	631,000	250,000
Stockpile ST-2	raw coal	77,000	180,000
Storage Bin ST-10	raw coal	≈ 50	550,000 <sup>2, 3, 6</sup>
Stockpile ST-11	raw coal	1,106,000	100,000 <sup>4</sup>
Stockpile ST-12	refuse	26,000	-----
Stockpile ST-13	clean or raw coal	514,000	360,000 <sup>5</sup>
Stockpile ST-14	raw coal	54,000	750,000 to 1,000,000 <sup>6</sup>
Stockpile ST-16	coal	120,000	360,000 <sup>7</sup>
	coal fines	combined	500,000 <sup>8</sup>

Notes:

- (1) Maximum quantity of coal to be delivered via trucks by other suppliers from outside sources.
- (2) Less the amount delivered directly to Stockpile ST-2.
- (3) Up to 250,000 TPY of the 550,000 TPY will pass over the truck scale near the refuse road.
- (4) Less the amount transferred from other stockpiles
- (5) Up to 360,000 TPY combined may be received at or shipped from ST-13 by truck.
- (6) The sum of coal trucked to Storage Pit ST-10 via the truck scale and the coal trucked to Stockpile ST-14 shall not exceed 1.0 million TPY.
- (7) Up to 360,000 TPY of coal may be received at or shipped from ST-16 by truck.
- (8) Up to 500,000 TPY of coal fines may be received at ST-16.

### ☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.7 & A.9: The permittee will maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments A through C in Permit 2183K and presented as Attachment K of this application. Records will be certified by a "responsible official" and maintained on site for a period of not less than five (5) years and will be made available to the Secretary or his or her duly authorized representative upon request. C.S.R. 45-13 Permit No. R13-2183K, Specific Requirement B.6.



**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: The following transfer limits between coal storage areas shall not be exceeded as determined using a 12-month rolling total:

Originating Stockpile ID No.	Maximum Amount to be Transferred to Stockpiles Listed Below (TPY) <sup>1</sup>						
	OS-1	ST-2	ST-10	ST-11	ST-13	ST-14	ST-16
OS-1	-----	100,000	350,000	100,000	100,000	100,000	100,000
ST-2	100,000	-----	280,000 <sup>2</sup>	100,000	100,000	100,000	100,000
ST-10	0	0	-----	0	0	0	0
ST-11	100,000	100,000	100,000	-----	100,000	100,000	100,000
ST-13	100,000	100,000	100,000	100,000	-----	100,000	100,000
ST-14	100,000	100,000	100,000	100,000	100,000	-----	100,000
ST-16	100,000	100,000	100,000	100,000	100,000	100,000	-----
All Areas <sup>2</sup>	100,000	100,000	530,000	100,000	100,000	100,000	100,000

**Notes:**

1. The quantities to be received for any single storage area are not additive.
2. The last row summarizes the maximum amount that could be transferred to each storage area from all other storage areas.
3. The permittee has the option to alternatively load up to 180,000 TPY into a railcar at ST-2 in lieu of transferring it to ST-10.

**X Permit Shield**

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: The permittee will maintain on site certified monthly and annual records of the raw coal, clean coal, and coal fines transfer rates in accordance with the example data forms provided as Attachments A through C in Permit 2183 and presented as Attachment K of this application. Records will be certified by a "responsible official" and maintained on site for a period of not less than five (5) years and will be made available to the Secretary or his or her duly authorized representative upon request. C.S.R. 45-13 Permit No. R13-2183K, Specific Requirement B.6.

<p><b>Applicable Requirements</b></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>C.S.R. § 45-13 Permit 2183K, Specific Requirements A.12: The permittee shall maintain and operate a vacuum truck along the paved entrance(s) to Stockpile OS-1 at all times during which truck traffic is present, either receiving or shipping coal.</p>
<p><input checked="" type="checkbox"/> <b>Permit Shield</b></p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>C.S.R. § 45-13 Permit 2183K, Specific Requirements A.12: The permittee will maintain daily records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. These records will be maintained on site for a period of no less than five (5) years. C.S.R. 45-30-5.1.c.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>



ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: ST-2	Emission unit name: Raw Coal Storage Pile	List any control devices associated with this emission unit: Minimize drop point	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 1.24-acre raw coal storage pile that receives coal from Conveyor C31-A and truck dump and transfers it via front-end loader to Feeder C36, Storage Pit ST-10, trucks, and/or railcar.			
Manufacturer: N/A	Model number: N/A	Serial number: N/A	
Construction date: Not Known	Installation date: 1981	Modification date(s): 2001	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 77,000 tons			
Maximum Hourly Throughput: N/A	Maximum Annual Throughput: 180,000 tons	Maximum Operating Schedule: 8760 hrs	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Requirements are presented above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Requirements are presented above under Emission Unit OS-1.

☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> ST-10	<b>Emission unit name:</b> Raw Coal Storage Pit ST-10	<b>List any control devices associated with this emission unit:</b> Partial Enclosure.
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):  
 50-ton raw coal storage pit that receives coal by truck dumping and front-endloader and transfers it to Conveyor C11-4.

<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1979	<b>Modification date(s):</b> 2001

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 50 tons

<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> 550,000 tons	<b>Maximum Operating Schedule:</b> 8760 hrs
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> ___ Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

### **Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Requirements are presented above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Requirement are presented above under Emission Unit OS-1.

☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> ST-11	<b>Emission unit name:</b> ST-11	<b>List any control devices associated with this emission unit:</b> Minimize drop
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

Stack Tube/Stockpile ST-11 - Receives coal from Conveyor S5 and transfers via underground feeder to Conveyor S3 and/or via front-endloader to truck.

<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1986	<b>Modification date(s):</b> 1998, 2001, 2006

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
1,106,000 tons

<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> See Applicable Requirements	<b>Maximum Operating Schedule:</b> 8760 hrs
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b>  <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data – See Attachment I</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Requirements are presented above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Requirements are presented above under Emission Unit OS-1.

☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: ST-12	Emission unit name: Refuse Stockpile ST-12	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Refuse Stockpile ST-12			
Manufacturer: N/A	Model number: N/A	Serial number: N/A	
Construction date: Not Known	Installation date: 1970	Modification date(s): N/A	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 26,000 tons			
Maximum Hourly Throughput: N/A	Maximum Annual Throughput: See Applicable Requirements	Maximum Operating Schedule: 8760 hrs.	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <u>X</u> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<i>Emissions Data – See Attachment I</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-5-7: Prevent and Control Air Pollution from Coal Refuse Disposal Areas.

C.S.R. § 45-5-8: Investigate Burning Coal Refuse as required.

45CSR13 (Permit R13-2183 Specific Requirement A.7): The maximum storage limit of refuse at the Refuse Storage ST-12 is 26,000 tons.

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For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-5-7 and C.S.R. § 45-5-8: None required.

45CSR13 (Permit R13-2183 Specific Requirement A.7): Maintain daily records of the amount of refuse in storage at the beginning of each day, the amounts transferred to and from ST-12 each day, and the amount of refuse in storage at the end of each day. 45CSR§30-5.1.c.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

<b>ATTACHMENT E - Emission Unit Form</b>			
<i>Emission Unit Description</i>			
<b>Emission unit ID number:</b> ST-13	<b>Emission unit name:</b> Stack Tube/Clean Coal Storage Stockpile ST-13	<b>List any control devices associated with this emission unit:</b> None	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> Stack Tube/Clean Coal Storage Stockpile ST-13 - Receives clean coal from Conveyor SC-1 and transfers it using six vibrating feeders to Belt Conveyor RC-1 and/or via front end loader to truck. Up to 360,000 TPY combined may be trucked to and from ST-13.			
<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1991	<b>Modification date(s):</b> 1998, 2002	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> 514,000 tons			
<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> See Applicable Requirements	<b>Maximum Operating Schedule:</b> 8760 hrs	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
<b>Does this emission unit combust fuel?</b> ___ Yes <u>  X  </u> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>    			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Requirements are presented above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Requirements are presented above under Emission Unit OS-1.

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For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: ST-14	Emission unit name: Raw Coal Open Stockpile	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Raw Coal Open Stockpile ST-14 - Receives coal by truck from offsite suppliers and transfers it via front-endloader to Dump Hopper DH-3 and/or front-endloader to truck.			
Manufacturer: N/A	Model number: N/A	Serial number: N/A	
Construction date: Not Known	Installation date: 2001	Modification date(s): 2002	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 54,000 tons			
Maximum Hourly Throughput: N/A	Maximum Annual Throughput: See Applicable Requirements	Maximum Operating Schedule: 8760 hrs	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

<i>Applicable Requirements</i>
<p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 &amp; A.9): Requirements are presented above under Emission Unit OS-1.</p> <p>C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 &amp; A.9: Requirements are presented above under Emission Unit OS-1.</p>
<input checked="" type="checkbox"/> Permit Shield
<p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 &amp; A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.</p> <p>C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 &amp; A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> ST-16	<b>Emission unit name:</b> Coal & Pond Fines Stockpiles ST-16	<b>List any control devices associated with this emission unit:</b> Moisture Control
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
Storage Stockpile ST-16 – Receives coal and pond fines by truck and transfers it via front-end loader to Dump Hopper DHRC-4; via underground feeders to conveyor C120; and/or via front-end loader to truck.

<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A
<b>Construction date:</b> 2002	<b>Installation date:</b> 2002	<b>Modification date(s):</b> 2008

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
120,000 tons

<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> See Applicable Requirements	<b>Maximum Operating Schedule:</b> 8760 hrs
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> ___ Yes <u> X </u> No	<b>If yes, is it?</b>  ___ Indirect Fired    ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Requirements are presented above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Requirements are presented above under Emission Unit OS-1.

☒ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.7 & A.9): Compliance demonstration methods are as described above under Emission Unit OS-1.

C.S.R. § 45-13 Permit 2183K, Specific Requirements A.8 & A.9: Compliance demonstration methods are as described above under Emission Unit OS-1.

Are you in compliance with all applicable requirements for this emission unit? ☒ Yes ☐ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> PRP and URP	<b>Emission unit name:</b> PRP: Paved Roads and Parking Lots; URP: Unpaved Roads and Parking Lots	<b>List any control devices associated with this emission unit:</b> Water trucks with pressurized sprays (see Applicable Requirements for OS-1 entrance area).
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

PRP: Paved roads and parking lots used by vehicular traffic.

URP: Unpaved roads and parking lots used by vehicular traffic.

<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1970	<b>Modification date(s):</b> 2001

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**

N/A

<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b> 8760 hrs
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### *Fuel Usage Data (fill out all applicable fields)*

<b>Does this emission unit combust fuel?</b> ___ Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b> ___ Indirect Fired ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b>	<b>Type and Btu/hr rating of burners:</b>

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide**



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</b></p> <p><b>See Attachment I for calculations and assumptions.</b></p>		

<p><i>Applicable Requirements</i></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>C.S.R. § 45-13 (Permit # 2183K, Specific Requirement A.12): Requirement is presented above under Emission Unit OS-1. Applies only to paved area at entrance of Storage Pile OS-1.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>C.S.R. § 45-13 (Permit # 2183K, Specific Requirement A.12): Compliance demonstration method is as described above under Emission Unit OS-1.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: SS-1	Emission unit name: Scalping Screen SS-1	List any control devices associated with this emission unit: Full Enclosure	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Scalping Screen SS-1 - Receives coal from Conveyor S10. Oversized coal is routed to the Rotary Breaker S6. Undersized coal goes to a two-way flop gate which can transfer coal to Conveyor RCT-1 or Conveyor S3B.			
Manufacturer: N/A	Model number: N/A	Serial number: N/A	
Construction date: Not Known	Installation date: 1998	Modification date(s): N/A	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 4,000 tons			
Maximum Hourly Throughput: 4,000 tons	Maximum Annual Throughput: 7,000,000 tons	Maximum Operating Schedule: 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

*Applicable Requirements*

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.6 & A.9): Requirements are presented above under Transfer Operations (Emission Units T4-1 through T135).

40 C.F.R. § 60.254(a), 60.11(c): 20% opacity.

40 C.F.R. § 60.11(d): Operating and maintenance procedures.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

C.S.R. § 45-13 (Permit # 2183K, Specific Requirements A.6 & A.9): Compliance demonstration methods are as described above under Transfer Operations (Emission Units T4-1 through T135).

40 C.F.R. § 60.254(a), 60.11(c): Compliance demonstration method is as described above under Emission Unit B4 (Breaker S6).

40 C.F.R. § 60.11(d): Compliance demonstration method is as described above under Emission Unit B4 (Breaker S6).

Are you in compliance with all applicable requirements for this emission unit? X Yes \_\_\_ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.



ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
<b>Emission unit ID number:</b> D-1, D-4, D-5	<b>Emission unit name:</b> Storage Tanks	<b>List any control devices associated with this emission unit:</b> None	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> The plant employs several small (less than 10,000 gallons) tanks to store diesel fuel (Tanks D-1, D-4, D-5), kerosene, waste oil, and miscellaneous aqueous solutions containing low vapor pressure organic compounds. These tanks are de minimis emission units that occasionally are replaced by similar de minimis tanks. They are not subject to any regulatory requirement. Emissions for the tanks that store diesel, kerosene, and the most volatile solution are presented in Attachment I and are deemed insignificant.			
<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1995 - 2004	<b>Modification date(s):</b> N/A	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> See Attachment I			
<b>Maximum Hourly Throughput:</b>	<b>Maximum Annual Throughput:</b> See Attachment I	<b>Maximum Operating Schedule:</b> 8760 hrs	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
<b>Does this emission unit combust fuel?</b> ___ Yes <input checked="" type="checkbox"/> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>    			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

See Attachment I for calculations and assumptions.

<i>Applicable Requirements</i>
<p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>There are no applicable requirements for any of the liquid tanks located at this facility.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p>
<p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>N/A</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

<b>ATTACHMENT E - Emission Unit Form</b>			
<i>Emission Unit Description</i>			
<b>Emission unit ID number:</b> TH-1, AFS-1, DSS-1, and DI-1	<b>Emission unit name:</b> Misc. VOC Evaporative Losses	<b>List any control devices associated with this emission unit:</b> None	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> This emission activity is comprised of miscellaneous VOC evaporative losses from the wet washing of the coal (TH-1), coal freeze protection (anti-freeze spray, AFS-1 and de-icing, DI-1), and dust suppression (DSS-1). There are no applicable regulatory requirements for the operations generating these emissions.			
<b>Manufacturer:</b> N/A	<b>Model number:</b> N/A	<b>Serial number:</b> N/A	
<b>Construction date:</b> Not Known	<b>Installation date:</b> 1970	<b>Modification date(s):</b> N/A	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> N/A			
<b>Maximum Hourly Throughput:</b> N/A	<b>Maximum Annual Throughput:</b> N/A	<b>Maximum Operating Schedule:</b> 8760	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
<b>Does this emission unit combust fuel?</b> ___ Yes <u> X </u> No		<b>If yes, is it?</b> ___ Indirect Fired    ___ Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

**See Attachment I for calculations and assumptions.**

<b>Applicable Requirements</b>
<p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>There are no applicable requirements for this emission unit/activity.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p>
<p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>N/A</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description</i>			
Emission unit ID number: D-15	Emission unit name: Magnetite Tank with Dust Collector D-15	List any control devices associated with this emission unit: Full Enclosure	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): This magnetite tank with dust collector stores magnetite that is pneumatically transferred to the tank and then it is used in the separation circuits in the coal washing process. The dust collector with fabric filter prevents the loss of material during the pneumatic conveyance of magnetite to the tank. Therefore, the dust collector is an integral part of the process rather than a control device.			
Manufacturer: Not Known	Model number: Not Known	Serial number: Not Known	
Construction date: Not Known	Installation date: 1970's	Modification date(s): N/A	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 100 tons			
Maximum Hourly Throughput 25 tons/hr	Maximum Annual Throughput: See Attachment I	Maximum Operating Schedule: 109 hrs/yr	
<i>Fuel Usage Data (fill out all applicable fields)</i>			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value



<b>Emissions Data – See Attachment I</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Attachment I for calculations and assumptions.

<p><i>Applicable Requirements</i></p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>C.S.R. § 45-7-3.1: 20% opacity limit.  C.S.R. § 45-7-3.1: 40% opacity limit for no more than 5 minutes in a 60 minute period.  C.S.R. § 45-7-4.1: Maximum allowable total stack emission rate shall not exceed 31 lb/hr.</p>
<p><input checked="" type="checkbox"/> Permit Shield</p> <p>For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)</p> <p>C.S.R. § 45-7-3.1 and C.S.R. § 45-7-3.1: No compliance demonstration is required because the tank vents inside the workspace of a building and only during filling, which last only approximately one hour.</p> <p>C.S.R. § 45-7-4.1: No compliance demonstration is required because uncontrolled emissions are less than allowable emissions.</p>
<p>Are you in compliance with all applicable requirements for this emission unit? <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>If no, complete the Schedule of Compliance Form as ATTACHMENT F.</p>

ATTACHMENT F

SCHEDULE OF COMPLIANCE  
NOT APPLICABLE

ATTACHMENT G

AIR POLLUTION CONTROL DEVICE FORMS



### ATTACHMENT G - Air Pollution Control Device Form

<b>Control device ID number:</b> 001-2A & 001- 2B (2 identical units)	<b>List all emission units associated with this control device.</b> Thermal Dryer TD1	
<b>Manufacturer:</b> American Air Filter	<b>Model number:</b> "A" Kinpactor	<b>Installation date:</b> 07/01/1970

**Type of Air Pollution Control Device:**  

<input type="checkbox"/> Baghouse/Fabric Filter	<input checked="" type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	

**List the pollutants for which this device is intended to control and the capture and control efficiencies.**  

Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100 %	99+ %

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

There are two identical scrubbers in parallel, each of which controls the exhaust from the two dryer cyclones. Each scrubber is designed to handle a maximum inlet gas flow of approximately 151,600 ft<sup>3</sup>/min at 248 °F and operate affectively when the pressure drop is maintained above 16 inches of water.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ☒ Yes    ☐ No

If Yes, Complete ATTACHMENT H

If No, Provide justification.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Monitoring of the performance of this device is prescribed by 45 CSR 5-4.1.b; 45 CSR 5-Appendix 2.a, 2b, and 2.3; and 45 CSR 13 (Permit 2183K). It includes monitoring of the thermal dryer exit temperature, the scrubber water supply pressure and the pressure drop across the scrubber. Monitoring is also performed in accordance with the WVDAQ-approved CAM Plan (see Attachment H).

### ATTACHMENT G - Air Pollution Control Device Form

<b>Control device ID number:</b> 0011 (Clean Coal Scrubber)	<b>List all emission units associated with this control device.</b> Conveyor 139 under the Clean Coal Silo (Transfers T20, T21, and T23)	
<b>Manufacturer:</b> Custom fabricated by previous owner	<b>Model number:</b> N/A	<b>Installation date:</b> Not Known
<b>Type of Air Pollution Control Device:</b>		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
<b>List the pollutants for which this device is intended to control and the capture and control efficiencies.</b>		
Pollutant	Capture Efficiency	Control Efficiency
Fugitive Dust	N/A	N/A
<b>Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).</b> The unit was custom- fabricated by previous plant owner to help control fugitive dust. Design data are not available.		
<b>Is this device subject to the CAM requirements of 40 C.F.R. 64?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If Yes, Complete ATTACHMENT H		
If No, Provide justification.    Conveyor 139, under the Clean Coal Silo (Transfers T20, T21, and T23), does not have pre-controlled emissions equal to or greater than major source thresholds and the clean coal scrubber has not been installed to achieve compliance with an emission limitation or standard.		
<b>Describe the parameters monitored and/or methods used to indicate performance of this control device.</b> The opacity of the scrubber exhaust vent is monitored as prescribed by 45 CSR 5-3.1 and 3.2.		



### ATTACHMENT G - Air Pollution Control Device Form

<b>Control device ID number:</b> 004 (Mix Scrubber)	<b>List all emission units associated with this control device.</b> Transfer points T16 (Conveyor C118), T17 (Horizontal Axis Mixer), and T18 (Conveyor C119).	
<b>Manufacturer:</b> Fisher-Klosterman	<b>Model number:</b> MS-650-H	<b>Installation date:</b> 03/31/1998

**Type of Air Pollution Control Device:**

<input type="checkbox"/> Baghouse/Fabric Filter	<input checked="" type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	

**List the pollutants for which this device is intended to control and the capture and control efficiencies.**

Pollutant	Capture Efficiency	Control Efficiency
Fugitive Dust	N/A	N/A

**Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).**

This scrubber was installed to help control the fugitive dust from transfer points T16, T17 (Horizontal Axis Mixer), and T18. It is designed to handle an inlet gas flow of approximated 23,400 ACFM at 103°F.

**Is this device subject to the CAM requirements of 40 C.F.R. 64?** ☐ Yes ☒ No

**If Yes, Complete ATTACHMENT H**

**If No, Provide justification.** Transfer points T16, T17 (Horizontal Axis Mixer), and T18 do not have pre-controlled emissions equal to or greater than major source thresholds and the mix scrubber has not been installed to achieve compliance with an emission limitation or standard.

**Describe the parameters monitored and/or methods used to indicate performance of this control device.**

The opacity of the scrubber exhaust vent is monitored as prescribed by 45 CSR 5-3.1 and 3.2.

ATTACHMENT H

CAMPLIANCE ASSURANCE MONITORING (CAM) FORMS  
NOT APPLICABLE

A Compliance Assurance Monitoring (CAM) Plan was submitted with the Title V renewal application in 2006 and incorporated into the current Title V permit. No modifications have been made to the operation of the devices subject to this CAM Plan that would require the plan to be updated. Pinnacle Mining will continue to operate under the current CAM Plan.

ATTACHMENT I  
POTENTIAL EMISSIONS CALCULATIONS

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR POLLUTANT SUMMARY

Criteria Pollutants

Source	PM (tons/yr)	PM10 (tons/yr)	SO <sub>2</sub> (tons/yr)	NOx (tons/yr)	CO (tons/yr)	VOC (tons/yr)
Thermal Dryer	272.70	248.15	178.14	332.55	178.14	146.26
Transfer Operations	16.24	7.68	---	---	---	---
Crushers/Breakers	6.60	3.12	---	---	---	---
Screens	1.26	0.60	---	---	---	---
Storage Piles - Drop Operations	6.10	2.89	---	---	---	---
Storage Piles - Wind Emissions	11.94	5.65	---	---	---	---
Roadways and Parking Lots	429.10	86.95	---	---	---	---
Wet Wash / Water Treatment	---	---	---	---	---	---
Dust Suppression	---	---	---	---	---	38.36
Antifreeze	---	---	---	---	---	0
Clean Coal Sampler	0.029	0.014	---	---	---	1.001
Kerosene Storage Tanks	---	---	---	---	---	---
Kerosene Filling, Dispensing and Spillage	---	---	---	---	---	0.00000
Frother Storage Tank	---	---	---	---	---	0.0054
Frother Filling, Dispensing and Spillage	---	---	---	---	---	0.002
Diesel Storage Tanks	---	---	---	---	---	0.0043
Diesel Filling, Dispensing and Spillage	---	---	---	---	---	0.0092
Magnetite Tank	0.06	0.06	---	---	---	0.69
Total	744	355	178	333	178	186



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR POLLUTANT SUMMARY

Hazardous Air Pollutants (HAPs)

Source	Lead (tons/yr)	2,2,4-Trimethylpentane (tons/yr)	Antimony (tons/yr)	Arsenic (tons/yr)	Benzene (tons/yr)
Thermal Dryer	1.56E-03	---	4.34E-04	7.99E-03	---
Transfer Operations	2.48E-04	---	1.51E-05	9.61E-04	---
Crushers/Breakers	1.01E-04	---	6.14E-06	3.91E-04	---
Screens	1.93E-05	---	1.17E-06	7.46E-05	---
Storage Piles - Drop Operations	9.34E-05	---	5.68E-06	3.61E-04	---
Storage Piles - Wind Emissions	1.83E-04	---	1.11E-05	7.07E-04	---
Roadways and Parking Lots	---	---	---	---	---
Wet Wash / Water Treatment	---	5.15E-02	---	---	2.24E+00
Dust Suppression	---	---	---	---	---
Antifreeze	---	---	---	---	---
Clean Coal Sampler	---	---	---	---	---
Kerosene Storage Tanks	---	0.00E+00	---	---	0.00E+00
Kerosene Filling, Dispensing and Spillage	---	1.76E-05	---	---	1.15E-04
Frother Storage Tank	---	---	---	---	---
Frother Filling, Dispensing and Spillage	---	---	---	---	---
Diesel Storage Tanks	---	2.60E-05	---	---	1.13E-03
Diesel Dispensing Operations	---	1.96E-03	---	---	8.53E-02
Magnetite Tank	---	---	---	---	---
Total	2.20E-03	5.35E-02	4.73E-04	1.05E-02	2.33

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR POLLUTANT SUMMARY

Hazardous Air Pollutants (HAPs) - continued

Source	Beryllium (tons/yr)	Biphenyl (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Cobalt (tons/yr)	Cresols (tons/yr)
Thermal Dryer	4.35E-04	---	1.71E-05	2.03E-03	2.88E-03	---
Transfer Operations	1.31E-05	---	1.06E-06	1.52E-04	1.32E-04	---
Crushers/Breakers	5.34E-06	---	4.29E-07	6.17E-05	5.35E-05	---
Screens	1.02E-06	---	8.19E-08	1.18E-05	1.02E-05	---
Storage Piles - Drop Operations	4.94E-06	---	3.97E-07	5.71E-05	4.94E-05	---
Storage Piles - Wind Emissions	9.66E-06	---	7.76E-07	1.12E-04	9.67E-05	---
Roadways and Parking Lots	---	---	---	---	---	---
Wet Wash / Water Treatment	---	3.99E-05	---	---	---	6.85E-04
Dust Suppression	---	---	---	---	---	---
Antifreeze	---	---	---	---	---	---
Clean Coal Sampler	---	---	---	---	---	---
Kerosene Storage Tanks	---	0.00E+00	---	---	---	0.00E+00
Kerosene Filling, Dispensing and Spillage	---	4.67E-08	---	---	---	2.05E-07
Frother Storage Tank	---	---	---	---	---	---
Frother Filling, Dispensing and Spillage	---	---	---	---	---	---
Diesel Storage Tanks	---	2.01E-08	---	---	---	3.46E-07
Diesel Dispensing Operations	---	1.52E-06	---	---	---	2.60E-05
Magnetite Tank	---	---	---	---	---	---
Total	4.69E-04	4.14E-05	1.99E-05	2.43E-03	3.22E-03	7.11E-04



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR POLLUTANT SUMMARY

Hazardous Air Pollutants (HAPs) - continued

Source	Cumene (tons/yr)	Ethylbenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Hydrochloric Acid (tons/yr)	Hydrogen Fluoride (tons/yr)
Thermal Dryer	---	---	6.27E-03	---	8.01	0.97
Transfer Operations	---	---	---	---	---	---
Crushers/Breakers	---	---	---	---	---	---
Screens	---	---	---	---	---	---
Storage Piles - Drop Operations	---	---	---	---	---	---
Storage Piles - Wind Emissions	---	---	---	---	---	---
Roadways and Parking Lots	---	---	---	---	---	---
Wet Wash / Water Treatment	6.79E-02	1.59E-01	---	4.49E+00	---	---
Dust Suppression	---	---	---	---	---	---
Antifreeze	---	---	---	---	---	---
Clean Coal Sampler	---	---	---	---	---	---
Kerosene Storage Tanks	0.00E+00	0.00E+00	---	0.00E+00	---	---
Kerosene Filling, Dispensing and Spillage	1.04E-05	4.79E-05	---	1.23E-03	---	---
Frother Storage Tank	---	---	---	---	---	---
Frother Filling, Dispensing and Spillage	---	---	---	---	---	---
Diesel Storage Tanks	3.43E-05	8.02E-05	---	2.27E-03	---	---
Diesel Dispensing Operations	2.58E-03	6.04E-03	---	1.71E-01	---	---
Magnetite Tank	---	---	---	---	---	---
Total	7.05E-02	1.65E-01	6.27E-03	4.66	8.01	0.97

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR POLLUTANT SUMMARY

Hazardous Air Pollutants (HAPs) - continued

Source	Manganese (tons/yr)	Mercury (tons/yr)	Naphthalene (tons/yr)	Nickel (tons/yr)	Phenol (tons/yr)	POM (tons/yr)
Thermal Dryer	5.00E-03	5.78E-03	---	4.37E-03	---	1.64E-03
Transfer Operations	1.59E-03	2.27E-06	---	3.09E-04	---	---
Crushers/Breakers	6.48E-04	9.24E-07	---	1.25E-04	---	---
Screens	1.24E-04	1.76E-07	---	2.39E-05	---	---
Storage Piles - Drop Operations	5.99E-04	8.54E-07	---	1.16E-04	---	---
Storage Piles - Wind Emissions	1.17E-03	1.67E-06	---	2.27E-04	---	---
Roadways and Parking Lots	---	---	---	---	---	---
Wet Wash / Water Treatment	---	---	1.61E-02	---	2.32E-03	---
Dust Suppression	---	---	---	---	---	---
Antifreeze	---	---	---	---	---	---
Clean Coal Sampler	---	---	---	---	---	---
Kerosene Storage Tanks	---	---	0.00E+00	---	0.00E+00	---
Kerosene Filling, Dispensing and Spillage	---	---	4.27E-06	---	7.45E-07	---
Frother Storage Tank	---	---	---	---	---	---
Frother Filling, Dispensing and Spillage	---	---	---	---	---	---
Diesel Storage Tanks	---	---	8.16E-06	---	1.17E-06	---
Diesel Dispensing Operations	---	---	6.14E-04	---	8.80E-05	---
Magnetite Tank	---	---	---	---	---	---
Total	9.14E-03	5.79E-03	1.68E-02	5.17E-03	2.41E-03	1.64E-03

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR POLLUTANT SUMMARY

Hazardous Air Pollutants (HAPs) - continued

Source	Selenium (tons/yr)	Styrene (tons/yr)	Toluene (tons/yr)	Xylene (tons/yr)	Total HAP (tons/yr)
Thermal Dryer	7.59E-04	---	---	---	9.01E+00
Transfer Operations	6.63E-05	---	---	---	3.25E-03
Crushers/Breakers	2.69E-05	---	---	---	1.32E-03
Screens	5.14E-06	---	---	---	2.52E-04
Storage Piles - Drop Operations	2.49E-06	---	---	---	1.22E-03
Storage Piles - Wind Emissions	4.87E-05	---	---	---	2.39E-03
Roadways and Parking Lots	---	---	---	---	0
Wet Wash / Water Treatment	---	1.43E-02	7.89E-01	4.44E-01	8.27E+00
Dust Suppression	---	---	---	---	0
Antifreeze	---	---	---	---	0
Clean Coal Sampler	---	---	---	---	0
Kerosene Storage Tanks	---	---	0.00E+00	0.00E+00	0.00E+00
Kerosene Filling, Dispensing and Spillage	---	---	3.22E-04	1.56E-04	1.90E-03
Frother Storage Tank	---	---	---	---	0
Frother Filling, Dispensing and Spillage	---	---	---	---	0
Diesel Storage Tanks	---	7.22E-06	3.99E-04	2.25E-04	4.18E-03
Diesel Dispensing Operations	---	5.43E-04	3.00E-02	1.69E-02	3.15E-01
Magnetite Tank	---	---	---	---	---
Total	9.31E-04	1.48E-02	8.20E-01	4.62E-01	17.62



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR POLLUTANT SUMMARY

Additional Pollutants

Source	CO <sub>2</sub> (tons/yr)	CH <sub>4</sub> (tons/yr)	N <sub>2</sub> O (tons/yr)	PM2.5 (tons/yr)	Ammonia (tons/yr)
Thermal Dryer	784.09	1.05	0.78	144.53	0.0148
Transfer Operations	---	---	---	1.16	---
Crushers/Breakers	---	---	---	0.47	---
Screens	---	---	---	0.09	---
Storage Piles - Drop Operations	---	---	---	0.44	---
Storage Piles - Wind Emissions	---	---	---	0.86	---
Roadways and Parking Lots	---	---	---	20.61	---
Wet Wash / Water Treatment	---	---	---	---	---
Dust Suppression	---	---	---	---	---
Antifreeze	---	---	---	---	---
Clean Coal Sampler	---	---	---	0.0020	---
Kerosene Storage Tanks	---	---	---	---	---
Kerosene Filling, Dispensing and Spillage	---	---	---	---	---
Frother Storage Tank	---	---	---	---	---
Frother Filling, Dispensing and Spillage	---	---	---	---	---
Diesel Storage Tanks	---	---	---	---	---
Diesel Dispensing Operations	---	---	---	---	---
Magnetite Tank	---	---	---	0.06	---
Total	784	1.05	0.78	168	1.48E-02

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
 TITLE V POTENTIAL TO EMIT CALCULATIONS  
 CRITERIA AIR POLLUTANT EMISSIONS FROM THERMAL DRYER

Pollutant	Emission Factor (lbs/hr) A	Operating Hours (hrs/yr) B	Emissions (lbs/yr) C	Emissions (tons/yr) D
Particulate Matter	77.00	7,083	545,391	272.70
PM10	70.07		496,306	248.15
PM2.5	40.81		289,057	144.53
Sulfur Dioxide	50.30		356,275	178.14
Nitrogen Oxides	93.90		665,094	332.55
Carbon Monoxide	50.30		356,275	178.14
VOC	41.30		292,528	146.26
Lead	See Air Toxics Calcs.			

NOTES:

A: Sulfur Dioxide, NOx, CO, & VOC from TraDet 1/1/97 stack test report; PM from TraDet, Inc., 10/2002 stack test report.

A: PM10: Emission Factor = (Particulate Matter Emission Factor) \* (0.91), where 0.91 is the PM10 mass fraction of total particulate matter (AP-42, 5th Ed., Appendix B.1, page B.1-52).

A: PM2.5: Emission Factor = (Particulate Matter Emission Factor) \* (0.53), where 0.53 is the PM2.5 mass fraction of total particulate matter (AP-42, 5th Ed., Appendix B.1, page B.1-52).

B: Operating hours obtained from Pinnacle Mining operating records.

C = A \* B

D = C / 2,000

**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
GREENHOUSE GAS EMISSIONS FROM THERMAL DRYER**

Pollutant	Emission Factor (lbs/ton) A	Quantity of Coal Burned (ton/yr) B	Emissions (lbs/yr) C	Emissions (tons/yr) D
Carbon Dioxide	30	52,273	1,568,176	784.09
Methane	0.04		2,091	1.045
Nitrous Oxide	0.03		1,568	0.78
Ammonia	0.000565		29.53	0.0148

**NOTES:**

A: Carbon Dioxide: Table 11.10-2 (November 1995), AP-42 Compilation of Air Pollutant Emission Factors. Emission factor for fluidized bed dryer with venturi scrubber.

A: Methane and Nitrous Oxide: Information obtained from Table 1.1-19 (September 1998), AP-42 Compilation of Air Pollutant Emission Factors. Emission factors are for a pulverized coal, dry bottom, wall-fired boiler.

A: Ammonia: FIRE Version 6.22, SCC 1-01-002-02.

B: Information obtained from Pinnacle Mining operating records.

$C = A * B$

$D = C / 2,000$



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR TOXIC EMISSIONS FROM THERMAL DRYER (COAL COMBUSTION)

Pollutant A	Concentration of Pollutant in Clean Coal (wt%) B	Quantity of Coal Burned (ton/yr) C	Pollutant Compound to Element Ratio D	Uncontrolled Emissions (lbs/yr) E	Control Efficiency (%) F	Controlled Emissions (lbs/yr) G	Controlled Emissions (tons/yr) H
Chloride / HCl Aerosol	0.075	52,273	1.03	80,083	80	16,017	8.008
Fluoride / HF	0.0088		1.05	9,684	80	1,937	0.97
Formaldehyde	0.000012		1	12.55	0	12.55	0.00627
Mercury	0.000011		1	11.56	0	11.56	0.00578
POM	0.0000031		1	3.29	0	3.29	0.001643

Notes:

- A: Except formaldehyde and POM, elements prior to the slash are found in clean coal and compounds to the right of the slash are manufactured during coal combustion. All Chloride and Fluoride is assumed to be converted into hydrochloric and hydrofluoric acid. Formaldehyde and POM are not present in coal but are formed during combustion.
- B: All except formaldehyde and POM: Information obtained from the following clean coal samples: Indian Ridge (Precision Testing Lab, 7/99), Pinnacle (Precision Testing Lab, 7/99), 100% Sewell (REI Consultants, 4/13/00, 2 analyses), Indian Ridge Product (REI Consultants, 4/13/00), and Pinnacle Product (REI Consultants, 4/13/00). The highest concentration of each constituent from all analyses was used for conservatism. Formaldehyde: Information based on formaldehyde emission factor (0.00024 lb formaldehyde/ton coal combusted) obtained from Table 1.1-14, AP-42 Compilation of Air Pollutant Emission Factors. Emission factor was converted to a "concentration in clean coal" by the following methodology:  
 $B = (0.00024 \text{ lb / ton}) * (1 \text{ ton} / 2000 \text{ lb}) * 100\%$
- Polycyclic Organic Matter (POM): Information based on POM emission factor (2.08 lb POM/10<sup>12</sup>Btu) obtained from Table 1.1-17, AP-42 Compilation of Air Pollutant Emission Factors. Emission factor was converted to a "concentration in clean coal" by the following methodology:  
 $B = ((2.08 * 15,112 \text{ Btu/lb coal}) / (10^{12} \text{ Btu})) * 100\%$
- C: Quantity of coal combusted in Thermal Dryer was obtained from Pinnacle operating records.
- D: Chloride and Fluoride are assumed to form (i.e., manufacture) a new compound (right side of slash in Column A). The compound to element ratio represents the ratio of molecular weight of the compound formed to that of the element.  
 $E = (B / 100\%) * (C * 2000 \text{ lb/ton}) * D$
- F: No control is assumed for potential emissions.
- F: Estimated hydrochloric acid aerosol control efficiency. Information obtained from letter dated December 15, 1999 from Randy Patrick, PES, to Larry King, USM, regarding review/comparison of Pinnacle CES and SARA Title III HAP emissions. A control efficiency of 80 to 90% is anticipated with the highly alkaline scrubber water used in the venturi scrubber. For conservatism, the lower value is used in these calculations (80%).  
 $G = E * (1 - (F / 100))$   
 $H = G / 2000 \text{ lbs/ton}$

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR TOXIC EMISSIONS FROM THERMAL DRYER (COAL COMBUSTION)

Pollutant A	Concentration of Pollutant in Clean Coal (wt%) B	Controlled Particulate Matter Emissions (tons/yr) C	Compound to Element Ratio D	Controlled Emissions (tons/yr) E
Antimony / Sb <sub>2</sub> O <sub>3</sub>	0.0001	272.70	2.39	4.34E-04
Arsenic / As <sub>2</sub> O <sub>3</sub>	0.0011		2.64	7.99E-03
Beryllium / BeO	0.000058		2.78	4.35E-04
Cadmium / CdO	0.0000055		1.14	1.71E-05
Chromium / CrO	0.00057		1.31	2.03E-03
Cobalt / CoO	0.00083		1.27	2.88E-03
Lead / PbO	0.00053		1.08	1.56E-03
Manganese / MnO	0.0014		1.29	5.00E-03
Nickel / NiO	0.0013		1.27	4.37E-03
Selenium / SeO <sub>2</sub>	0.00020		1.41	7.59E-04

Notes:

- A: Elements prior to the slash are found in clean coal and compounds to the right of the slash are manufactured during coal combustion. It is assumed that the lowest weight metal compound (metal oxides) is formed during combustion *EPCRA Section 313 Industry Guidance - Coal Mining Facilities*, EPA 745-B-99-002, January 1999).
- B: Information obtained from the following clean coal samples: Indian Ridge (Precision Testing Lab, 7/99), Pinnacle (Precision Testing Lab, 7/99), 100% Sewell (REI Consultants, 4/13/00, 2 analyses), Indian Ridge Product (REI Consultants, 4/13/00), and Pinnacle Product (REI Consultants, 4/13/00); and Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999 (Antimony only). The highest concentration of each constituent from all analyses was used for conservatism.
- C: See "Criteria Air Pollutant Emissions from Thermal Dryer".
- D: Each element in Column A is assumed to form (i.e., manufacture) a new compound (right side of slash in Column A). The compound to element ratio represents the ratio of molecular weight of the compound formed to that of the element.
- E = (B / 100%) \* C \* D

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
PARTICULATE MATTER EMISSIONS FROM TRANSFER OPERATIONS

Transfer Point	From	To	Estimated Throughput (tons/yr)	Moisture Content (%)	Particulate Emission Factor (lbs/ton)	Uncontrolled Particulate Emissions (lbs/yr)	Control Efficiency (%)	Controlled Particulate Emissions (lbs/yr)	Controlled Particulate Emissions (tons/yr)	Controlled PM10 Emissions (tons/yr)	Controlled PM2.5 Emissions (tons/yr)
			A	B	C	D	E	F	G	H	I
T50	S10	Screen SS-1	7,000,000	7.3	0.00084	5,893	80	1,179	0.59	0.28	0.042
T110	Screen SS-1	S3A	0	7.3	0.00084	0	80	0	0	0	0.000
T54	Screen SS-1	Breaker S6	1,750,000	7.3	0.00084	1,473	80	295	0.15	0.070	0.011
T28-3	Breaker S6	S7	87,500	3.0	0.0029	256	50	128	0.064	0.030	0.005
T27-5	Breaker S6	S5	1,662,500	7.3	0.00084	1,400	50	700	0.35	0.17	0.025
T51	Screen SS-1	RCT-1	2,625,000	7.3	0.00084	2,210	80	442	0.22	0.105	0.016
T52	RCT-1	S5	2,625,000	7.3	0.00084	2,210	80	442	0.22	0.105	0.016
T49	S5	Stockpile ST-11	4,287,500	7.3		REFER TO "STORAGE PILES - DROP OPERATIONS"					
T32	Stockpile ST-11	S3	4,287,500	7.3	0.00084	3,610	80	722	0.36	0.17	0.026
T33	S3	S3B	4,287,500	7.3	0.00084	3,610	50	1,805	0.90	0.43	0.065
T53	Screen SS-1	S3B	2,625,000	7.3	0.00084	2,210	80	442	0.22	0.105	0.016
T34	S3B	C24	6,912,500	7.3	0.00084	5,820	50	2,910	1.45	0.69	0.104
T93	Dump Truck	ST-14	1,000,000	7.3		REFER TO "STORAGE PILES - DROP OPERATIONS"					
T84	ST-14 Front-End Loader	Dump Hopper DH-3	1,000,000	7.3	0.00084	842	50	421	0.21	0.100	0.015
T95	Dump Hopper DH-3	Conveyor C10-3	1,000,000	7.3	0.00084	842	50	421	0.21	0.100	0.015
T96	Conveyor C10-3	Mine Car Dump MCD-1	1,000,000	7.3	0.00084	842	80	168	0.084	0.040	0.006
T65	Truck Dumping	Stockpile OS-1	250,000	7.3		REFER TO "STORAGE PILES - DROP OPERATIONS"					
T92	Stockpile Area OS-1	Dump Truck (to ST-10 & ST-14)	250,000	7.3	0.00084	210	0	210	0.10524	0.04977	0.007537
T114	Truck Dumping	Stockpile ST-13	0	5.8		REFER TO "STORAGE PILES - DROP OPERATIONS"					
T113	Stockpile ST-2	Rail Car	180,000	7.3	0.00084	152	0	152	0.076	0.0358	0.0054
T4-8	Truck Dumping	Storage Pit ST-10	550,000	7.3	0.00084	463	0	463	0.23	0.110	0.0166
T4-9	Storage Pit ST-10	C11-4	550,000	7.3	0.00084	463	50	232	0.116	0.055	0.0083



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM TRANSFER OPERATIONS

Transfer Point	From	To	Estimated Throughput (tons/yr) A	Moisture Content (%) B	Particulate Emission Factor (lbs/ton) C	Uncontrolled Particulate Emissions (lbs/yr) D	Control Efficiency (%) E	Controlled Particulate Emissions (lbs/yr) F	Controlled Particulate Emissions (tons/yr) G	Controlled PM10 Emissions (tons/yr) H	Controlled PM2.5 Emissions (tons/yr) I
T73	C11-4	C11-1	275,000	7.3	0.00084	232	50	116	0.058	0.027	0.0041
T74	C11-4	C11-2	275,000	7.3	0.00084	232	50	116	0.058	0.027	0.0041
T72a	Mine Car Dump MCD-1	C11-1	500,000	7.3	0.00084	421	80	84	0.042	0.020	0.0030
T72b	Mine Car Dump MCD-1	C11-2	500,000	7.3	0.00084	421	80	84	0.042	0.020	0.0030
T111	S3A	C11-1	0	7.3	0.00084	0	50	0	0	0	0.0000
T112	S3A	C11-2	0	7.3	0.00084	0	50	0	0	0	0.0000
T75	C11-1	Breaker 13-1	775,000	7.3	0.00084	652	50	326	0.163	0.077	0.0117
T76	C11-2	Breaker 13-2	775,000	7.3	0.00084	652	50	326	0.16	0.077	0.0117
T8-1	Breaker 13-1	C24	736,250	7.3	0.00084	620	50	310	0.155	0.073	0.0111
T8-2	Breaker 13-2	C24	736,250	7.3	0.00084	620	50	310	0.155	0.073	0.0111
T9-1a	Breaker 13-1	8A	38,750	3.0	0.0029	113	50	57	0.028	0.0134	0.0020
T9-1b	Breaker 13-2	8A	38,750	3.0	0.0029	113	50	57	0.028	0.0134	0.0020
T10-1	C24	C31 A	838,500	7.3	0.00084	706	50	353	0.18	0.083	0.0126
T10-2	C24	C31	3,773,250	7.3	0.00084	3,177	80	635	0.32	0.15	0.0228
T10-3	C24	Raw Coal Silo ST-3	3,773,250	7.3	0.00084	3,177	80	635	0.32	0.15	0.0228
T10-4	C31	Raw Coal Silo ST-4	3,773,250	7.3	0.00084	3,177	80	635	0.32	0.15	0.0228
T11	C31-A	Stockpile ST-2	838,500	7.3	REFER TO "STORAGE PILES - DROP OPERATIONS"						
T77	Stockpile ST-2	C36 Feeder	838,500	7.3	0.00084	706	50	353	0.18	0.083	0.013
T12-1	Raw Coal Silo ST-3	C37	3,773,250	7.3	0.00084	3,177	80	635	0.32	0.15	0.023
T12-2	Raw Coal Silo ST-4	C37	3,773,250	7.3	0.00084	3,177	80	635	0.32	0.15	0.023
T12-3	C36 Feeder	C37	838,500	7.3	0.00084	706	80	141	0.071	0.033	0.005
T13	C37	C45	8,385,000	7.3	0.00084	7,059	100	0	0	0	0.000
T48-2	8A	C8	77,500	3.0	0.0029	227	80	45	0.023	0.0107	0.002
T29	S7	Rock Bin	87,500	3.0	0.0029	256	50	128	0.064	0.030	0.005
T34-2a	Rock Bin	Rock Crusher #6	0	3.0	0.0029	0	80	0	0	0	0.000
T34-2b	Rock Bin	C8	87,500	3.0	0.0029	256	80	51	0.026	0.0121	0.002
T35	Rock Crusher #6	C8	0	3.0	0.0029	0	80	0	0	0	0.000
T36	C8	Refuse Bin ST-7	165,000	3.0	0.0029	482	80	96	0.048	0.023	0.003
T37	C125	Refuse Bin ST-7	2,096,250	12.0	0.00042	880	80	176	0.088	0.042	0.006
T38	Refuse Bin ST-7	C128-1	2,261,250	12.0	0.00042	949	80	190	0.095	0.045	0.007
T39	C128-1	Storage Bin ST-8	2,261,250	12.0	0.00042	949	80	190	0.095	0.045	0.007
T40	Storage Bin ST-8	C128-2	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017
T41	C128-2	C128-3	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM TRANSFER OPERATIONS

Transfer Point	From	To	Estimated Throughput (tons/yr) A	Moisture Content (%) B	Particulate Emission Factor (lbs/ton) C	Uncontrolled Particulate Emissions (lbs/yr) D	Control Efficiency (%) E	Controlled Particulate Emissions (lbs/yr) F	Controlled Particulate Emissions (tons/yr) G	Controlled PM10 Emissions (tons/yr) H	Controlled PM2.5 Emissions (tons/yr) I
T42	C128-3	C128-4	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017
T43	C128-4	C128-5	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017
T44	C128-5	C128-6	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017
T121	C128-6	Stacking Belt	2,261,250	12.0	0.00042	949	50	475	0.24	0.112	0.017
T45	Stacking Belt	Refuse Stockpile ST-12	2,261,250	12.0							
T15	C100	Thermal Dryer	4,472,000	12.0	0.00042	1,877	50	939	0.47	0.22	0.034
T122	Clean Coal Truck	ST-16	360,000	5.8							
T134	Pond Fines Truck	ST-16	500,000	18.0							
T124	Endloader at ST-16	DHRC-4	0	12.9	0.0004	0	0	0	0.000	0.000	0.0000
T125	DHRC-4	C120	0	12.9	0.0004	0	0	0	0.000	0.000	0.0000
T126	ST-16	C120	860,000	12.9	0.0004	327	80	65	0.033	0.015	0.0023
T127A	Conveyer C120	Conveyer C121	43,800	12.9	0.0004	17	50	8	0.004	0.002	0.0003
T127B	Conveyer C120	RC-5	816,200	12.9	0.0004	310	50	155	0.077	0.037	0.0055
T128	Conveyer C121	Sample Collector	43,800	12.9	0.0004	17	80	3	0.002	0.001	0.0001
T129	Sample Collector	Conveyer C122	43,800	12.9	0.0004	17	80	3	0.002	0.001	0.0001
T130	Conveyer C122	RC-5	43,800	12.9	0.0004	17	50	8	0.004	0.002	0.0003
T16	C118	Mixer No. 120	6,288,750	5.8	0.0012	7,306	95	365	0.18	0.086	0.0131
T17	Mixer No. 120	C119	6,288,750	5.8	0.0012	7,306	95	365	0.18	0.086	0.0131
T18	C119	C132	6,288,750	5.8	0.0012	7,306	95	365	0.18	0.086	0.0131
T19	C132	Clean Coal Silo ST-5	1,886,625	5.8	0.0012	2,192	80	438	0.22	0.104	0.0157
T19-A	C132	SC-1	4,402,125	5.8	0.0012	5,114	80	1,023	0.51	0.24	0.0366
T19-B	SC-1	Stockpile ST-13	4,402,125	5.8							
T20	Clean Coal Silo ST-5	C139	1,886,625	5.8	0.0012	2,192	95	110	0.055	0.026	0.0039
T21	C139	C141	1,886,625	5.8	0.0012	2,192	95	110	0.055	0.026	0.0039
T22	Stockpile ST-13	RC-1	4,402,125	5.8	0.0012	5,114	80	1,023	0.51	0.24	0.0366
T81	RC-5	RC-1	860,000	5.8	0.0012	999	80	200	0.10	0.05	0.0072
T23	RC-1	C141	5,262,125	5.8	0.0012	6,113	95	306	0.15	0.072	0.0109
T24	C141	C152	7,148,750	5.8	0.0012	8,305	80	1,661	0.83	0.39	0.0595
T25	C152	Loading Bin ST-6	7,148,750	5.8	0.0012	8,305	80	1,661	0.83	0.39	0.0595
T26	Loading Bin ST-6	Rail Car	7,148,750	5.8	0.0012	8,305	80	1,661	0.83	0.39	0.0595
T119	Front-End Loader at ST-13	Dump Truck	360,000	5.8	0.0012	418	0	418	0.21	0.10	0.0150
-	Clean Coal Sampler	-	-	-	-	-	-	-	-	-	-
-	Scale Sampler	-	-	-	-	-	-	-	-	-	-
T101, Note J	Dump Truck	ST-2	180,000	7.3							
See Note K	Origin Stockpile Front-End Loader	Dump Truck	100,000	7.3	0.00084	84	0	84	0.042	0.020	0.0030
See Note K	Dump Truck	Destination Stockpile	100,000	7.3							
-	Endloader at Green Ridge II	Dump Truck	1,000,000	7.3	0.00084	842	0	842	0.421	0.199	0.0301
TOTAL						146,012		32,479	16.24	7.68	1.16

Table notes appear on next page



**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM TRANSFER OPERATIONS**

**NOTES**

A. Coal processing information obtained from Pinnacle operating records:

Raw coal feed (from No. 50 Mine, after breakers) =	6,912,500 tons
25% of No. 50 Mine raw coal passes through breaker and 5% of raw coal is refuse which is removed in the rotary breakers, thus No. 50 Mine output (run of mine) = Raw Coal Feed / (1 - (0.25 * 0.05))	7,000,000 tons
Run of mine coal input to Old Saw Mill Site =	250,000 tons
Coal processed through Old Saw Mill Screen OSS-1 =	0 tons
Coal From Outside Sources to ST-10 directly:	550,000 tons
Coal From Outside Sources to ST-10 via Truck Scale:	250,000 tons
Coal From Outside Sources directly to ST-10	550,000 tons
Coal From OS-1 to ST-10	250,000 tons
Coal From ST-2 (temp. storage for ST-10) to Rail Cars:	180,000 tons
Coal from Outside Sources to ST-14	1,000,000 tons
Coal From Outside Sources to ST-14 via OS-1	0 tons
Other Coal From Outside Sources to ST-14	1,000,000 tons
Total Coal From Outside Sources	1,550,000 tons
Coal moving flexibility from any pile to any pile	100,000 tons
Coal moving flexibility temporary storage at ST-2 for transfer to ST-10	180,000 tons
Recovered Pond Fines trucked to ST-16	500,000 tons
Coal trucked to ST-16	360,000 tons
Coal/pond fines transferred to DHRC-4	300,000 tons
Coal/pond fines transferred from ST-16 via feeders	150,000 tons
Maximum capacity of wash circuit = 1,500 tph * 7,083 hr/yr =	10,624,500 tons
Maximum capacity of thermal dryer = 800 tph * 7,083 hr/yr =	5,666,400 tons
Prep Plant feed (calculated above) =	8,385,000 tons
Thermal Dryer feed (calculated above) =	4,472,000 tons
Total clean coal processed = 75% Prep Plant Feed =	6,288,750 tons

B. Typical moisture values estimated with Pinnacle Mining operating records.

$$C = k * 0.0032 * (U / 5)^{1.3} / (M / 2)^{1.4}$$

where k = particulate size multiplier = 0.74 for particulate matter

U = mean wind speed = 9.1 mph

M = percent moisture from column B

Equation is from Section 13.2.4 of AP-42 (November 2006).

$$D = A * C$$

E. Control efficiencies as follows (per WVOAQ guidance):

0% for no control (open transfer)	80% for full enclosure / underground transfer
50% for partial enclosure	95% for full enclosure vented to scrubber
70% for conveyor transfer with water spray	99% for full enclosure vented to baghouse

$$F = D * (1 - E / 100)$$

$$G = F / 2,000$$

$$H = G * 0.35 / 0.74, \text{ where } 0.35 \text{ and } 0.74 \text{ are the particle size multipliers for PM}_{10} \text{ and PM, respectively. (See also Note C)}$$

$$I = G * 0.053 / 0.74, \text{ where } 0.053 \text{ and } 0.74 \text{ are the particle size multipliers for PM}_{2.5} \text{ and PM, respectively. (See also Note C)}$$

J. Coal hauled for temporary storage at ST-2. This amount that is eventually transferred into ST-10 is accounted for in the calculations for ST-10.

K. The "Origin Stockpile Front-End Loader to Dump Truck" Transfer Points are as follows: T92 (Front-end Loader at OS-1),

T100 (Front-end Loader at ST-2), T102 (Front-end Loader at ST-11), T104 (Front-end Loader at ST-14),

T119 (Front-end Loader at ST-13), T105 (Front-end loader at ST-10), and T135 (Front-end loader at ST-18). The "Dump Truck to Destination Stockpile"

Transfer Points are as follows: T65 (Truck Dump at OS-1), T101 (Truck Dump at ST-2), T4-8 (Truck Dump at ST-10),



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR TOXIC EMISSIONS FROM TRANSFER OPERATIONS (COAL PARTICULATE)

Pollutant	Coal Particulate HAP Concentration (wt%) A	Particulate Matter Emissions (tons/yr) B	Coal Particulate HAP Emissions (lbs/yr) C	Coal Particulate HAP Emissions (tons/yr) D
Antimony	0.000093	16.24	0.030	1.51E-05
Arsenic	0.0059		1.92	9.61E-04
Beryllium	0.000081		0.026	1.31E-05
Cadmium	0.0000065		0.0021	1.06E-06
Chromium	0.00094		0.30	1.52E-04
Cobalt	0.00081		0.26	1.32E-04
Lead	0.0015		0.50	2.48E-04
Manganese	0.0098		3.19	1.59E-03
Mercury	0.000014		0.0045	2.27E-06
Nickel	0.0019		0.62	3.09E-04
Selenium	0.00041		0.133	6.63E-05

Notes:

A: Information obtained from raw coal samples taken July 1999 by Precision Testing Laboratory and May 4, 2000 by REIC. The concentration of Antimony was obtained from Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999. The highest chemical concentration among the samples was used for conservatism.

B: See "Particulate Matter Emissions from Transfer Operations"

C = (A / 100) \* B \* 2000

D = C / 2,000

**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT**  
**TITLE V POTENTIAL TO EMIT CALUCLATIONS**  
**PARTICULATE MATTER EMISSIONS FROM CRUSHERS / BREAKERS**

Unit	Material Throughput (tons/yr) A	Particulate Emission Factor (lbs/ton) B	Uncontrolled Particulate Emissions (lbs/yr) C	Control Efficiency (%) D	Controlled Particulate Emissions (lbs/yr) E	Controlled Particulate Emissions (tons/yr) F	Controlled PM10 Emissions (tons/yr) G	Controlled PM2.5 Emissions (tons/yr) H
Rock Crusher #6	0	0.018	0	80	0	0	0	0.00
Breaker 13-1	775,000	0.020	15,500	80	3,100	1.55	0.73	0.11
Breaker 13-2	775,000	0.020	15,500	80	3,100	1.55	0.73	0.11
Breaker S6	1,750,000	0.020	35,000	80	7,000	3.50	1.66	0.25
146 Clean Coal Sampler	REFER TO CLEAN COAL SAMPLER TRANSFER OPERATIONS AND CRUSHERS							
		TOTAL	66,000		13,200	6.60	3.12	0.47

**NOTES:**

A: Values obtained from estimated raw coal throughput for crushers/breakers #6, 13-1, 13-2, and S6 (see transfer operations calculations).

B: Emission factors per WVOAQ guidance document.

C = A \* B

D: Control efficiencies as follows (per WVOAQ guidance): 80% for full enclosure  
99% for full enclosure vented to baghouse

E = C \* (1 - D / 100)

F = E / 2,000

G = F \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42 (November 2006).

H = F \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42 (November 2006).

**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT**  
**TITLE V POTENTIAL TO EMIT CALUCLATIONS**  
**PARTICULATE MATTER EMISSIONS FROM SCREENS**

Unit	Material Throughput (tons/yr) A	Particulate Emission Factor (lbs/ton) B	Uncontrolled Particulate Emissions (lbs/yr) C	Control Efficiency (%) D	Controlled Particulate Emissions (lbs/yr) E	Controlled Particulate Emissions (tons/yr) F	Controlled PM10 Emissions (tons/yr) G	Controlled PM2.5 Emissions (tons/yr) H
Scalping Screen SS-1	7,000,000	0.0018	12,600	80	2,520	1.26	0.60	0.09
		TOTAL	12,600		2,520	1.26	0.60	0.09

**NOTES:**

A: Values obtained from estimated raw coal throughput for SS-1 (see transfer operations calculations).

B: Emission factor approved by WVOAQ during permitting of source installation.

C = A \* B

D: Control efficiencies as follows (per WVOAQ guidance): 80% for full enclosure

E = C \* (1 - D / 100)

F = E / 2,000

G = F \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42 (November 2006).

H = F \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42 (November 2006).

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR TOXIC EMISSIONS FROM CRUSHERS / BREAKERS (COAL PARTICULATE)

Pollutant	Coal Particulate HAP Concentration (wt%) A	Particulate Matter Emissions (tons/yr) B	Coal Particulate HAP Emissions (lbs/yr) C	Coal Particulate HAP Emissions (tons/yr) D
Antimony	0.000093	6.60	0.012	6.14E-06
Arsenic	0.0059		0.78	3.91E-04
Beryllium	0.000081		0.011	5.34E-06
Cadmium	0.000065		0.0069	4.29E-07
Chromium	0.00094		0.12	6.17E-05
Cobalt	0.00081		0.11	5.35E-05
Lead	0.0015		0.20	1.01E-04
Manganese	0.0098		1.30	6.48E-04
Mercury	0.000014		0.0018	9.24E-07
Nickel	0.0019		0.25	1.25E-04
Selenium	0.00041		0.054	2.69E-05

Notes

A. Information obtained from raw coal samples taken July 1999 by Precision Testing Laboratory and May 4, 2000 by REIC. The concentration of Antimony was obtained from Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999.

The highest chemical concentration among the samples was used for conservatism.

B. See "Particulate Matter Emissions from Crushers / Breakers"

C = (A / 100) \* B \* 2000

D = C / 2,000

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR TOXIC EMISSIONS FROM SCREENS (COAL PARTICULATE)

Pollutant	Coal Particulate HAP Concentration (wt%) A	Particulate Matter Emissions (tons/yr) B	Coal Particulate HAP Emissions (lbs/yr) C	Coal Particulate HAP Emissions (tons/yr) D
Antimony	0.000093	1.26	0.0023	1.17E-06
Arsenic	0.0059		0.15	7.46E-05
Beryllium	0.000081		0.0020	1.02E-06
Cadmium	0.000065		0.0016	8.19E-08
Chromium	0.00094		0.024	1.18E-05
Cobalt	0.00081		0.020	1.02E-05
Lead	0.0015		0.039	1.93E-05
Manganese	0.0098		0.25	1.24E-04
Mercury	0.000014		0.00035	1.76E-07
Nickel	0.0019		0.048	2.39E-05
Selenium	0.00041		0.0103	5.14E-06

Notes

A: Information obtained from raw coal samples taken July 1999 by Precision Testing Laboratory and May 4, 2000 by REIC. The concentration of Antimony was obtained from Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999. The highest chemical concentration among the samples was used for conservatism.

B: See "Particulate Matter Emissions from Screens"

C = (A / 100) \* B \* 2000

D = C / 2,000



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM UNPAVED ROADWAYS AND PARKING AREAS

Vehicle Type	S	W	Particulate Emission Factor lbs/VMT	PM10 Emission Factor lbs/VMT	PM2.5 Emission Factor lbs/VMT
1 Plant Vehicles	5.1	1.5	1.11	0.29	0.03
2 Maintenance Trucks	5.1	12.5	2.87	0.74	0.07
3 P&H Crane	5.1	15	3.12	0.80	0.08
4 Empty Dump Truck via Overland Road	5.1	14	3.02	0.78	0.08
5 Loaded Dump Truck via Overland Road	5.1	44	5.06	1.31	0.13
6 Endloader @ OS-1(OSS-1 Related)	5.1	47	5.22	1.35	0.13
7 Full Truck from Outside Sources to ST-10 via Truck Scale	5.1	44	5.06	1.31	0.13
8 Full Truck from Outside Sources directly to ST-10	5.1	44	5.06	1.31	0.13
9 Empty Truck from ST-10 directly to SR 12/3	5.1	14	3.02	0.78	0.08
10 Truck from OS-1 to ST-10 directly from SR 12/3	5.1	29	4.20	1.08	0.11
11 Full Truck from ST-10 to ST-2	5.1	44	5.06	1.31	0.13
12 Empty Truck from ST-2 to SR 12/3 Exit	5.1	14	3.02	0.78	0.08
13 Front-end Loader at ST-2 to ST-10 or Rail Cars	5.1	47	5.22	1.35	0.13
14 Full Truck from Outside Sources to ST-14	5.1	44	5.06	1.31	0.13
15 Empty Truck from ST-14 to Outside Sources	5.1	14	3.02	0.78	0.08
16 Front-end Loader at ST-14 (for transfer to DH-3)	5.1	47	5.22	1.35	0.13
17 Full Truck from Origin Stockpile to Destination Stockpile	5.1	44	5.06	1.31	0.13
18 Empty Truck from Destination Stockpile to Origin Stockpile	5.1	14	3.02	0.78	0.08
19 Front-end Loader at Origin Stockpile (for truck to Destination Stockpile)	5.1	47	5.22	1.35	0.13
20 Endloader at ST-13 to truck	5.1	47	5.22	1.35	0.13
21 Endloader at ST-16 to truck or DHRC-4	5.1	47	5.22	1.35	0.13
22 Truck between ST-13 & SR 12/3	5.1	29	4.20	1.08	0.11
23 Endloader at Green Ridge II Stockpile	5.1	47	5.22	1.35	0.13

Table continued on next page.



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
PARTICULATE MATTER EMISSIONS FROM UNPAVED ROADWAYS AND PARKING AREAS

Vehicle Type	VMt/yr	Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)	Controlled PM2.5 Emissions (ton/yr)
1) Plant Vehicles	15,132	85	1.26	0.32	0.032
2) Maintenance Trucks	3,640	85	0.78	0.20	0.020
3) P&H Crane	52	85	0.012	0.0031	0.00031
4) Empty Dump Truck via Overland Road	747	85	0.17	0.044	0.0044
5) Loaded Dump Truck via Overland Road	747	85	0.28	0.073	0.007
6) Endloader @ OS-1(OSS-1 Related)	911	85	0.356	0.0919	0.0092
7) Full Truck from Outside Sources to ST-10 via Truck Scale	1,941	85	0.74	0.19	0.0190
8) Full Truck from Outside Sources directly to ST-10	284	85	0.11	0.03	0.0028
9) Empty Truck from ST-10 directly to SR 12/3	521	85	0.12	0.030	0.0030
10) Truck from OS-1 to ST-10 directly from SR 12/3	3,504	85	1.1028	0.2845	0.0284
11) Full Truck from ST-10 to ST-2	170	85	0.06	0.02	0.0017
12) Empty Truck from ST-2 to SR 12/3 Exit	170	85	0.04	0.01	0.0010
13) Front-end Loader at ST-2 to ST-10 or Rail Cars	1,023	85	0.40	0.10	0.0103
14) Full Truck from Outside Sources to ST-14	15,379	85	5.84	1.51	0.15
15) Empty Truck from ST-14 to Outside Sources	15,379	85	3.49	0.90	0.090
16) Front-end Loader at ST-14 (for transfer to DH-3)	947	85	0.37	0.096	0.0096
17) Full Truck from Origin Stockpile to Destination Stockpile	2,518	85	0.96	0.25	0.025
18) Empty Truck from Destination Stockpile to Origin Stockpile	2,518	85	0.57	0.147	0.015
19) Front-end Loader at Origin Stockpile (for truck to Destination Stockpile)	95	85	0.037	0.0096	0.00096
20) Endloader at ST-13 to truck	341	85	0.133	0.0344	0.0034
21) Endloader at ST-16 to truck or DHRC-4	341	85	0.13	0.03	0.00
22) Truck between ST-13 & SR 12/3	6,977	85	2.196	0.5665	0.057
23) Endloader at Green Ridge II Stockpile	947	85	0.370	0.0956	0.010
TOTAL			19.53	5.04	0.50

Notes

Emission Factor is from AP-42, Section 13.2.2 (November, 2006), Equation 2 (with p=160 days with 0.01 inches of precipitation per year), adjusted for speed as allowed on page 13.2.2-4. The values for the parameters s, W, M and S listed in the table above are from the sources listed below.

Emission Factor (lbs/VMt) =  $[k * (s / 12)^a * (W / 3)^b]$

W is mean vehicle weight (tons)

s is from AP-42 Table 13.2.2-1 for western surface coal mining

k, a, and b for particulate, PM10, and PM2.5 (not shown above) is from AP-42 Table 13.2.2-2

Notes continued on next page.

**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT**  
**TITLE V POTENTIAL TO EMIT CALCULATIONS**  
**PARTICULATE MATTER EMISSIONS FROM UNPAVED ROADWAYS AND PARKING AREAS**

Vehicle Miles Traveled (VMT) were obtained as follows

1. 2. 3 VMT from Title V permit application PTE calculations; estimated with Pinnacle operating records.
4. 5 VMT = (2100 ft / 5280 ft) \* 6 trips/day \* (365 days - 52 days)
- 6 VMT for endloader at OS-1 loading a truck for transport to ST-10 or ST-14, 5 2-ton loader bucket, and average 50-foot trip and the material hauled (250,000 tons/yr)
- 7 VMT/yr based on the distance of the haul road from SR 12/3 to Truck Scale (1080 ft round trip) and from SR 12/3 to ST-10 (150 ft one-way) and amount of material hauled (250,000 tons/yr) in 30-ton capacity trucks
- 8 VMT/yr based on the distance of the haul road from SR 12/3 directly to ST-10 (150 ft one-way) and amount of material hauled (300,000 tons/yr) in 30-ton capacity trucks
- 9 VMT/yr based on the distance of the haul road from ST-10 directly to SR 12/3 (150 ft one-way) and number of empty trucks leaving site based on material hauled (550,000 tons/yr) in 30-ton capacity trucks
- 10 VMT/yr based on the distance of the haul road from the mid-point of OS-1 to SR 12/3 (960 ft one-way, doubled for round trip) and from SR 12/3 to ST-10 (150 ft one-way, doubled for round trip) and amount of material hauled (250,000 tons/yr) in 30-ton capacity trucks
- 11 VMT/yr based on the distance of the haul road from ST-10 to ST-2 for a loaded truck (150 ft) and the amount of material hauled (180,000 tons/yr) in 30-ton capacity trucks. Calculations for emissions generated by truck traffic prior to ST-10 can be found on Item 10
- 12 VMT/yr based on the distance of the haul road from ST-2 to ST-10 for an empty truck (150 ft) and amount of material hauled (180,000 tons/yr) in 30-ton capacity trucks
- 13 VMT/yr based on the distance of the haul road from ST-2 to ST-10 or Rail Cars for a Front-end Loader (150 ft, doubled for round trips) and amount of material hauled (180,000 tons/yr) in 10-ton capacity buckets on Front-end Loaders
- 14 VMT/yr based on the distance of the haul road (overland road) from SR 12/3 to ST-14 for a loaded truck (2336 ft) and a 100 ft entrance at Green Ridge, and amount of material hauled (1,000,000 tons/yr) in 30-ton capacity trucks
- 15 VMT/yr based on the distance of the haul road (overland road) from SR 12/3 to ST-14 for a loaded truck (2336 ft) and a 100 ft entrance at Green Ridge, and amount of material hauled (1,000,000 tons/yr) in 30-ton capacity trucks
- 16 VMT/yr based on the distance of ST-14 to DH-3 (25 ft one-way, doubled for round-trip) and amount of material hauled (1,000,000 tons/yr) in 10-ton capacity front-end loaders
- 17 and 18 The emissions from these items represent the worst-case scenario for moving 100,000 tons per year of coal from any stockpile on-site to any other stockpile on-site. The worst-case emissions scenario was determined to be the transfer of coal from Stockpile OS-1 to Stockpile ST-11. While an empty truck return trip for this scenario does not travel on the same roads as the full truck, it still represents the worst case scenario because of the length of unpaved roads traveled
- 19 VMT/yr based on the distance of OS-1 to the receiving truck (25 ft one-way, doubled for round trip) and amount of material hauled (100,000 tons/yr) in 10-ton capacity front-end loaders
- 20 VMT/yr for endloader based on the distance of 25 ft to transfer material from ST-13 into truck, and amount of material hauled (0 tons/yr) in 10-ton capacity front-end loader
- 21 VMT/yr for endloader based on the distance of 25 ft to transfer pond fines into DHRC-4 or truck, and the amount of material hauled (360,000 tons/yr) in 10-ton capacity front-end loader
- 22 VMT/yr for clean coal dump trucks (unpaved) based on the distance of 1535 ft (trucks hauling clean coal from SR 12/3 to ST-13) and amount of material hauled (360,000 tons/yr clean coal) in 30-ton capacity trucks (then multiplied by 2 for trip back and forth)
- 23 VMT/yr for endloader based on the distance of 50 ft to transfer material from Green Ridge II stockpile into truck, and amount of material hauled (1,000,000 tons/yr) in 10-ton capacity front-end loader

Control efficiencies as follows (per WVQAQ guidance)

85% for water truck, manufactured, pressurized water/chemical sprays  
75% for water truck, manufactured, pressurized sprays



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM PAVED ROADWAYS AND PARKING AREAS

Vehicle Type	k	sL	W	Particulate Emission Factor lbs/MT	MT/yr	Uncontrolled Particulate Emissions (lb/yr)	Uncontrolled Particulate Emissions (ton/yr)	Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)
1 Car / Light Duty Gas	0.011	70	1.5	0.71	1,182	836	0.42	75	0.105	0.0209	0.0051
2 Plant Vehicles	0.011	70	1.5	0.71	6,916	4,892	2.45	75	0.61	0.1223	0.0300
3 Fork Lift	0.011	70	4.0	1.92	91	175	0.09	75	0.022	0.0044	0.0011
4 Maintenance Trucks	0.011	70	12.5	6.15	1,456	8,954	4.48	75	1.12	0.2239	0.0549
5 Maintenance 4-Wheeler	0.011	70	0.5	0.23	364	84	0.042	75	0.0105	0.0021	0.0005
6 P&H Crane	0.011	70	15.0	7.41	52	385	0.19	75	0.048	0.0096	0.0024
7 Dump Trucks	0.011	70	15.0	7.41	6,000	44,441	22.22	75	5.56	1.1110	0.2727
8 Dump Truck Entering/Exiting Truck Scale Area	0.011	17.5	29.0	4.11	732	3,010	1.50	75	0.38	0.0752	0.0185
9 Dump Truck Entering/Exiting OS-1	0.011	17.5	29.0	4.11	0	0	0.00	75	0.000	0.0000	0.0000
10 Truck between ST-13 & point on SR 12/3 where county maintains it (SR 12/3)	0.011	70	29.0	14.51	15,423	223,784	111.89	75	27.973	5.5946	1.3732
11 Full Truck from Outside Sources to ST-10 via Truck Scale	0.011	70	44.0	22.20	14,118	313,414	156.71	75	39.177	7.8354	1.9232
12 Full Truck from Outside Sources directly to ST-10	0.011	70	44.0	22.20	15,900	352,973	176.49	75	44.122	8.8243	2.1660
13 Empty Truck from ST-10 directly to SR 12/3	0.011	70	14.0	6.90	29,150	201,239	100.62	75	25.155	5.0310	1.2349
14 Truck from OS-1 to ST-10 directly from SR 12/3	0.011	70	44.0	22.20	7,333	162,797	81.40	75	20.350	4.0699	0.9990
15 Full Truck from Outside Sources to ST-14	0.011	70	44.0	22.20	67,333	1,494,770	747.38	75	186.946	37.3692	9.1724
16 Empty Truck from ST-14 to Outside Sources	0.011	70	14.0	6.90	67,333	464,840	232.42	75	58.105	11.6210	2.8524
<b>TOTAL</b>						<b>1638.30</b>			<b>409.57</b>	<b>81.91</b>	<b>20.11</b>

NOTES

Emission estimation equations from AP-42 Section 13.2.1 (January 2011). Equation (1) for industrial paved roads.

Emission Factor (lbs/MT) =  $k \cdot (sL)^{0.61} \cdot (W)^{1.02} \cdot (1 - P / 4N)$

Variable definitions:

k = particle size multiplier for particle size PM-10 in units of lb/MT

W = average weight (tons) of vehicles traveling the road

sL = road surface silt loading for particle size range of interest. The AP-42 Table 13.2.1-3 value for sand and gravel processing (70 g/m<sup>2</sup>) was reduced by 75% to 17.5 g/m<sup>2</sup> for the road at

Truck Scale Area and OS-1 (#8 and #9 above) because the particular road is vacuumed at least once per day

P = 160 days with 0.01 inches of precipitation per year

N = 365 day in a year

Vehicle Miles Traveled (VMT) were obtained as follows:

1 - 7 VMT estimated with Pinnacle operating records

8 VMT/yr based on the travel over paved section of the haul road between SR 12/3 and Truck Scale Area (232 ft one-way, doubled for round-trip) and amount of material hauled

(250,000 tons/yr) in 30-ton capacity trucks.

9 VMT data based on a road length of 100 ft. with round trips determined from Screen OSS-1 throughput (250,000 tons/yr). VMT is based on the assumption that all the coal screened by

OSS-1 is hauled away from OS-1, rock from DHOS-1 (250,000 tons/yr) is used as base material at OS-1, and the amount of material hauled in each truck.

10 VMT/yr for dump trucks (paved) based on the distance of 225 ft (the paved section for trucks hauling clean coal off SR 12/3 to ST-13) and 0.6 miles (ST-13 & to point on SR 12/3 where county maintains it) and amount of material hauled (360,000 tons/yr) in 30-ton capacity trucks (then multiplied by 2 for trip back and forth). VMT/hr based on 12 truck trips per hour (then

multiplied by 2 for trip back and forth)

11 VMT/yr based on the distance of SR 12/3 from Green Ridge II to ST-10 (1.59 miles one-way) plus 225 ft paved entrance section to scale area and amount of material hauled

(250,000 tons/yr) in 30-ton capacity trucks.

12 VMT/yr based on the distance of SR 12/3 from Green Ridge II to ST-10 (1.59 miles one-way) and amount of material hauled (300,000 tons/yr) in 30-ton capacity trucks.

13 VMT/yr based on the distance of SR 12/3 from Green Ridge II to ST-10 (1.59 miles one-way) and number of empty trucks leaving site based on material hauled (550,000 tons/yr) in

30-ton capacity trucks.

14 VMT/yr based on the distance of SR 12/3 from OS-1 to ST-10 (0.44 miles one-way, doubled for round trip) and amount of material hauled (250,000 tons/yr) in 30-ton capacity trucks.

15 VMT/yr based on the distance of SR 12/3 from Green Ridge II to ST-14 for a loaded truck (2.02 miles) and amount of material hauled (1,000,000 tons/yr) in 30-ton capacity trucks.

16 VMT/yr based on the distance of SR 12/3 from ST-14 to Green Ridge II for an empty truck (2.02 ft) and amount of material hauled (1,000,000 tons/yr) in 30-ton capacity trucks.

Control of road dust through the use of a pressurized water truck with manufactured spray bar/nozzles is required by Permit R13-2163A. Pinnacle Mining uses a vacuum truck to help clean the entrance to OS-1.

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM STORAGE PILES - DROP OPERATIONS

Transfer Point	From	To	Estimated Throughput (tons/yr) A	Moisture Content (%) B	Particulate Emission Factor (lbs/ton) C	Uncontrolled Particulate Emissions (lbs/yr) D	Control Efficiency (%) E	Controlled Particulate Emissions (lbs/yr) F	Controlled Particulate Emissions (tons/yr) G	Controlled PM10 Emissions (tons/yr) H	Controlled PM2.5 Emissions (tons/yr) I
T11	C31-A	ST-2 (Raw Coal)	838,500	7.3	0.00084	706	0	706	0.35	0.17	0.025
T49	S5	ST-11 (Raw Coal)	4,287,500	7.3	0.00084	3,610	0	3,610	1.80	0.85	0.129
T45	Stacking Belt	ST-12 (Refuse)	2,261,250	12.0	0.00042	949	0	949	0.47	0.22	0.034
T19-B	SC-1	ST-13 (Clean Coal)	4,402,125	5.8	0.0012	5,114	0	5,114	2.56	1.21	0.183
T114	Truck Dumping	ST-13 (Raw/Clean Coal)	0	5.8	0.0012	0	0	0	0	0	0.000
T65	Truck Dumping	OS-1 (Raw Coal)	250,000	7.3	0.00084	210	0	210	0.105	0.0498	0.008
T93	Dump Truck	ST-14 (Raw Coal)	1,000,000	7.3	0.00084	842	0	842	0.42	0.20	0.030
T101, Note J	Dump Truck	ST-2	180,000	7.3	0.00084	152	0	152	0	0	0.005
T122	Clean Coal Truck	ST-16	360,000	5.8	0.0012	418	0	418	0	0	0.015
T134	Pond Fines Truck	ST-16	500,000	18.0	0.00024	119	0	119	0	0	0.004
See Note K	Dump Truck	Destination Stockpile	100,000	7.3	0.00084	84	0	84	0.042	0.020	0.003
TOTAL						12,205		12,205	6.10	2.89	0.44

NOTES

A See "Particulate Matter Emissions From Transfer Operations"

B Typical moisture values estimated with Pinnacle Mining operating records

$$C = k * 0.0032 * (U / 5)^{1.5} / (M / 2)^{1.4}$$

where k = particulate size multiplier = 0.74 for particulate matter

U = mean wind speed = 9.1 mph

M = percent moisture from column B

Equation is from Section 13.2.4 of AP-42 (November 2006)

$$D = A * C$$

E No control efficiencies due to open transfer of material

$$F = D * (1 - E / 100)$$

$$G = F / 2,000$$

H = G \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively (See also Note C)

I = G \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively (See also Note C)

J Coal hauled for temporary storage at ST-2. This amount that is eventually transferred into ST-10 and is accounted for in the calculations for ST-10

K The "Origin Stockpile Front-End Loader to Dump Truck" Transfer Points are as follows: T92 (Front-end Loader at OS-1),

T100 (Front-end Loader at ST-2), T102 (Front-end Loader at ST-11), T104 (Front-end Loader at ST-14),

T119 (Front-end Loader at ST-13), T105 (Front-end loader at ST-10), and T135 (Front-end loader at ST-16). The "Dump Truck to

Destination Stockpile" Transfer Points are as follows: T65 (Truck Dump at OS-1), T101 (Truck Dump at ST-2),

T4-B (Truck Dump at ST-10), T103 (Truck Dump at ST-11), T93 (Truck Dump at ST-14), T114 (Truck Dump at ST-13),

and T122 (Truck Dump at ST-16)

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
AIR TOXIC EMISSIONS FROM STORAGE PILES - DROP OPERATIONS

Pollutant	Coal Particulate HAP Concentration (wt%) A	Particulate Matter Emissions (tons/yr) B	Coal Particulate HAP Emissions (lbs/yr) C	Coal Particulate HAP Emissions (tons/yr) D
Antimony	0.000093	6.10	0.011	5.68E-06
Arsenic	0.0059		0.72	3.61E-04
Beryllium	0.000081		0.0099	4.94E-06
Cadmium	0.000065		0.00079	3.97E-07
Chromium	0.00094		0.114	5.71E-05
Cobalt	0.00081		0.099	4.94E-05
Lead	0.0015		0.19	9.34E-05
Manganese	0.0098		1.20	5.99E-04
Mercury	0.000014		0.0017	8.54E-07
Nickel	0.0019		0.23	1.16E-04
Selenium	0.00041		0.050	2.49E-05

Notes:

A. Information obtained from raw coal samples taken July 1999 by Precision Testing Laboratory and May 4, 2000 by REIC. The concentration of Antimony was obtained from Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999. The highest chemical concentration among the samples was used for conservatism.

B. See "Particulate Matter Emissions from Storage Piles - Drop Operations"

C = (A / 100) \* (B \* 2000)

D = C / 2,000



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
PARTICULATE MATTER EMISSIONS FROM STORAGE PILES - WIND EROSION

Storage Pile	Area		Particulate Matter Emissions				PM10 Emissions	PM2.5 Emissions
	(ft <sup>2</sup> ) A	(acre) B	(lbs/acre/day) C	(lbs/day) D	(lbs/yr) E	(tons/yr) F	(tons/yr) G	(tons/yr) H
ST-2 (Raw Coal)	54,000	1.24	2.90	3.60	1,312	0.66	0.31	0.047
ST-11 (Raw Coal)	320,000	7.35	2.90	21.30	7,776	3.89	1.84	0.278
ST-12 (Refuse)	21,825	0.50	2.90	1.45	530	0.27	0.13	0.019
ST-13 (Clean Coal)	220,000	5.05	2.90	14.65	5,346	2.67	1.26	0.191
OS-1 (Raw Coal)	220,000	5.05	2.90	14.65	5,346	2.67	1.26	0.191
ST-14 (Raw Coal)	38,000	0.87	2.90	2.53	923	0.46	0.22	0.033
ST-16 (Clean Coal)	108,900	2.500	2.90	7.250	2,646	1.323	0.626	0.095
				TOTAL	23,880	11.94	5.65	0.86

NOTES:

A: Information obtained from Pinnacle Mining operating records.

B = A / 43,560 ft<sup>2</sup>/acre

C:  $E = 1.7 * (s / 1.5) * ((365 - p) / 235) * (f / 15)$

where E = uncontrolled emission factor (lb/day/acre)

s = % silt = 2.2% for coal (AP-42, 5th Ed., Table 13.2.4-1, November 2006).

p = number of days when precipitation greater than or equal to 0.01" = 160 days (AP-42, 5th Ed., Fig. 13.2.2-1).

f = % time when wind speed exceeds 12 mph = 20 (WVOAQ).

Equation is from 'Air Pollution Engineering Manual', Air and Waste Management Association, 1992.

D = B \* C

E = D \* 365 days/yr

F = E / 2,000

G = F \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42.

H = F \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42.

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
AIR TOXIC EMISSIONS FROM STORAGE PILES - WIND EROSION

Pollutant	Coal Particulate HAP Concentration (wt%) A	Particulate Matter Emissions (tons/yr) B	Coal Particulate HAP Emissions (lbs/yr) C	Coal Particulate HAP Emissions (tons/yr) D
Antimony	0.000093	11.94	0.022	1.11E-05
Arsenic	0.0059		1.41	7.07E-04
Beryllium	0.000081		0.019	9.66E-06
Cadmium	0.000065		0.0016	7.76E-07
Chromium	0.00094		0.22	1.12E-04
Cobalt	0.00081		0.19	9.67E-05
Lead	0.0015		0.37	1.83E-04
Manganese	0.0098		2.35	1.17E-03
Mercury	0.000014		0.0033	1.67E-06
Nickel	0.0019		0.45	2.27E-04
Selenium	0.00041		0.097	4.87E-05

Notes

A. Information obtained from raw coal samples taken July 1999 by Precision Testing Laboratory and May 4, 2000 by REIC. The concentration of Antimony was obtained from Table 3-4, *EPCRA Section 313 Industry Guidance, Coal Mining Facilities*, EPA 745-B-99-002, January 1999. The highest chemical concentration among the samples was used for conservatism.

B. See "Particulate Matter Emissions from Storage Piles - Wind Erosion"

C = (A / 100) \* (B \* 2000)

D = C / 2,000

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
VOC AND AIR TOXIC EMISSIONS FROM WET WASH, ANTIFREEZE, AND DUST SUPPRESSION

Product (Use)	Annual Usage (gal/yr) A	Volatility (%) B	Retained By Solids (%) C	Max Density (lb/gal) D	Max VOC (ton/yr) E
Naico 8843 (Wet Wash)	45,270	12.0	10	7.7	18.82
Diesel OR Naico 9344 (Wet Wash)	63,000	9.0	10	7.1	18.12
Naico 83904 (Wet Wash - Water Treatment)	14,050	45.0	95	9.0	1.42
Naico 9851 (Wet Wash - Water Treatment)	5,560	0	95	8.8	0
Naico 7880 (Wet Wash - Water Treatment)	85,950	0	95	10.3	0
Subtotal - Wet Wash					39.36
Naico 8803 (Dust Suppression)	14,999	0	100	8.9	0
Naico 1293 (Dust Suppression)	6,399	0	100	8.7	0
Subtotal - Dust Suppression					0
Naico 8882 (Freeze Conditioner)	5,250	8.5	95	9.0	0.100
Naico 8880 (Freeze Conditioner)	43,256	8.5	95	9.8	0.901
Subtotal - Freeze Conditioner					1.001
TOTAL					39.36

AIR TOXIC SPECIATION PROFILE\*

Pollutant	Percentage* (wt%)	Emissions (tons/yr)
2,2,4-Trimethylpentane	0.28	0.052
Benzene	12.38	2.24
Biphenyl	0.00022	0.000040
Cresols	0.0038	0.00068
Cumene	0.37	0.068
Ethylbenzene	0.88	0.16
Hexane	24.76	4.49
Naphthalene	0.089	0.016
Phenol	0.013	0.0023
Styrene	0.079	0.014
Toluene	4.36	0.79
Xylene	2.45	0.44

NOTES

A. Annual usage obtained from purchase records.

B. Percent volatilization based on BACT/LAER Analysis of PA Plan Approval Application for Permit #30-0072B. Products with 0% volatility are either polymer or inorganic solutions. Percent volatility for Naico 9851 based on %VOC from MSDS and percent volatility for Naico 9344 based on data from Jeff Stone of Naico on 3/4/15 phone call with R. Patrick.

C. Percent retained by solids obtained from BACT/LAER Analysis of PA Plan Approval Application for Permit #30-0072B.

D. Density of material.

E = A \* D \* (B / 100) \* (1 - (C / 100)) / 2000 lb/ton

\* Speciation profile obtained from Radian Corporation report prepared for J.F. Durham, USEPA (August 10, 1993), regarding liquid and vapor HAP concentrations of various petroleum products.

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM CLEAN COAL SAMPLING SYSTEM - TRANSFER OPERATIONS

Source ID No.	Emission Point ID No.*	Transfer From	Transfer To	Maximum Throughput (tons/hr)	Wind Speed (mph)	Moisture Content (%)	Particulate Emission Factor (lbs/ton)	Uncontrolled Particulate Emissions (lbs/hr)	Control Efficiency (%)	Controlled Particulate Emissions (lbs/hr)	Operating Hours (hrs/yr)	Controlled Particulate Emissions (tons/yr)	Controlled PM10 Emissions (tons/yr)	Controlled PM2.5 Emissions (tons/yr)
				A	B	C	D	E	F	G	H	I	J	K
S01	F01	Conveyor #141	Primary Sample Belt Feeder	20.25	1.3	5.8	9.26E-05	0.0019	95	0.000094	7,083	0.00033	0.00016	0.00002
S02	F02	Primary Sample Belt Feeder	Primary Crusher	7.6	1.3	5.8	9.26E-05	0.00070	95	0.000035	7,083	0.00012	0.000059	0.00001
S04	F02	Primary Crusher	Tertiary Sample Belt Feeder	7.6	1.3	5.8	9.26E-05	0.00070	95	0.000035	7,083	0.00012	0.000059	0.00001
S05	F02	Tertiary Sample Belt Feeder	Sample Collector	0.2	1.3	5.8	9.26E-05	0.000019	95	0.00000093	7,083	0.0000033	0.0000016	0.00000
S06	F02	Tertiary Sample Belt Feeder	Sample Rejects Conveyor	7.4	1.3	5.8	9.26E-05	0.00069	95	0.000034	7,083	0.00012	0.000057	0.00001
S07	F02	Primary Sample Belt Feeder	Nuclear Analyzer	12.65	1.3	5.8	9.26E-05	0.0012	95	0.000059	7,083	0.00021	0.000096	0.00001
S08	F02	Nuclear Analyzer	Discharge Sample Belt Feeder	12.65	1.3	5.8	9.26E-05	0.0012	95	0.000059	7,083	0.00021	0.000096	0.00001
S09	F02	Discharge Sample Belt Feeder	Sample Rejects Conveyor	12.65	1.3	5.8	9.26E-05	0.0012	95	0.000059	7,083	0.00021	0.000096	0.00001
S10	F01	Sample Rejects Conveyor	Conveyor #141	20.05	1.3	5.8	9.26E-05	0.0019	95	0.000093	7,083	0.00033	0.00016	0.00002
TOTAL												0.0017	0.00078	0.00012

NOTES

\* Two fugitive emission locations have been identified, the Conveyor 141/Sampler Belt Enclosure (F01), and the Coal Sampler/Nuclear Analyzer Enclosure (F02)

A. Maximum throughput determined for worst-case (highest) sampling rate (i.e. smallest consignment size)

B. Mean wind speed (u) = 1.3 mph (lowest valid wind speed from AP-42) for operations inside buildings / enclosed structures

C. Typical moisture values for cleaned coal

$D = k * 0.0032 * (U / 5)^{-1.3} / (M / 2)^{1.4}$

where k = particulate size multiplier = 0.74 for particulate matter

U = mean wind speed from column B

M = percent moisture from column C

E = A \* D

F. Control Efficiencies from WVDES Guidance for Coal Prep Plants

95% for full enclosure vented to scrubber

G = E \* (100 - F) / 100

H = Maximum hours of operation per year

I = G \* H / 2,000 lbs/ton

J = I \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42

K = I \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
PARTICULATE MATTER EMISSIONS FROM CLEAN COAL SAMPLING SYSTEM - CRUSHERS

Source ID No.	Emission Point ID No.	Crusher ID	Maximum Throughput (tons/hr) A	Particulate Emission Factor (lbs/ton) B	Uncontrolled Particulate Emissions (lbs/hr) C	Control Efficiency (%) D	Controlled Particulate Emissions (lbs/hr) E	Operating Hours (hrs/yr) F	Controlled Particulate Emissions (tons/yr) G	Controlled PM10 Emissions (tons/yr) H	Controlled PM2.5 Emissions (tons/yr) I
S03	F02	Sampler Primary Crusher	7.6	0.020	0.15	95	0.0076	7,083	0.027	0.013	0.0019

NOTES:

A: Maximum throughput determined for worst-case (highest) sampling rate (i.e. smallest consignment size).  
B: Emission factors per WVOAQ guidance document.

C = A \* B

D: Control efficiency of 95% for full enclosure vented to scrubber per WVOAQ guidance.

E = C \* (1 - D / 100)

F = Maximum hours of operation per year.

G = E \* F / 2,000 lb/ton

H = G \* 0.35 / 0.74, where 0.35 and 0.74 are the particle size multipliers for PM10 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42.

I = G \* 0.053 / 0.74, where 0.053 and 0.74 are the particle size multipliers for PM2.5 and PM, respectively, for the aggregate handling equation, Section 13.2.4 of AP-42.



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
 TITLE V POTENTIAL TO EMIT CALUCLATIONS  
 TOTAL VOC EMISSIONS FROM DIESEL, KEROSENE AND OTHER STORAGE TANKS

Storage Tank	Working / Breathing Losses (tons/yr)	Loading / Dispensing / Spillage Losses (tons/yr)	Total Losses (tons/yr)
D-1 Tank Diesel Throughput (SPCC-PPP-04, off-road vehicles, 15,000 gal)	0.0083	0.65	0.65
D-4 Tank Diesel Throughput (SPCC-PPP-08, on-road vehicles, 1000 gal)	0.00000	0.041	0.041
D-5 Tank Diesel Throughput (SPCC-PPP-09, process, 6000 gal)	0.0009	0.0013	0.0021
Kerosene Tank Throughput (SPCC-PPP-17, thermal dryer, 3500 gal)	0.00000	0.0054	0.0054
GPP-O13883-02 Frother	0.002	0.0043	0.007
TOTAL	0.012	0.70	0.71

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
VOC EMISSIONS FROM DIESEL STORAGE TANKS (BREATHING/WORKING LOSSES)

Storage Tank	Capacity (gal)	Throughput (gal/yr) A	VOC Emissions			
			Working Losses (lb/yr) B	Breathing Losses (lb/yr) B	Total Losses (lb/yr) B	Total Losses (ton/yr) C
D-1 Tank Diesel Throughput (SPCC-PPP-04, off-road vehicles, 15,000 gal)	15,000	810,000	12.36	4.17	16.53	0.0083
D-4 Tank Diesel Throughput (SPCC-PPP-08, on-road vehicles, 1000 gal)	1,000	52,000	0	0	0	0.00000
D-5 Tank Diesel Throughput (SPCC-PPP-09, process, 6000 gal)	6,000	63,000	1.01	0.77	1.78	0.0009
TOTAL						0.0092

AIR TOXIC SPECIATION PROFILE\*

Pollutant	Percentage* (wt%)	Emissions (tons/yr)
2,2,4-Trimethylpentane	0.28	2.60E-05
Benzene	12.38	1.13E-03
Biphenyl	0.00022	2.01E-08
Cresols	0.0038	3.46E-07
Cumene	0.37	3.43E-05
Ethylbenzene	0.88	8.02E-05
Hexane	24.76	2.27E-03
Naphthalene	0.089	8.16E-06
Phenol	0.013	1.17E-06
Styrene	0.079	7.22E-06
Toluene	4.36	3.99E-04
Xylene	2.45	2.25E-04

NOTES:

A: Annual usage provided by Pinnacle operating records.

B: Emission values obtained from USEPA TANKS v4.09b.

C = B / 2000

\* Speciation profile obtained from Radian Corporation report prepared for J.F. Durham, USEPA (August 10, 1993), regarding liquid and vapor HAP concentrations of various petroleum products.

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
VOC EMISSIONS FROM DIESEL FUEL TANK LOADING, DISPENSING, AND SPILLAGE

Storage Tank	Capacity (gal)	Throughput (gal/yr) A	Annual VOC Losses			VOC Emissions (lbs/yr) E	VOC Emissions (tons/yr) F
			Tank Loading (lbs/gal) B	Vehicle Refueling (lbs/gal) C	Spillage (lbs/gal) D		
D-1 Tank Diesel Throughput (SPCC-PPP, 04, off-road vehicles, 15,000 gal)	15,000	810,000	0.000040	0.00086	0.0007	1292.41	0.646
D-4 Tank Diesel Throughput (SPCC-PPP, 08, on-road vehicles, 1000 gal)	1,000	52,000	0.000040	0.00086	0.0007	82.97	0.0415
D-5 Tank Diesel Throughput (SPCC-PPP, 09, process, 6000 gal)	6,000	63,000	0.000040	---	---	2.51	0.00126
TOTAL							0.689

AIR TOXIC SPECIATION PROFILE\*

Pollutant	Percentage* (wt%)	Emissions (tons/yr)
2,2,4-Trimethylpentane	0.28	1.98E-03
Benzene	12.38	8.53E-02
Biphenyl	0.00022	1.52E-06
Cresols	0.0038	2.60E-06
Cumene	0.37	2.58E-03
Ethylbenzene	0.88	6.04E-03
Hexane	24.76	1.71E-01
Naphthalene	0.089	6.14E-04
Phenol	0.013	8.80E-05
Styrene	0.079	5.43E-04
Toluene	4.36	3.00E-02
Xylene	2.45	1.69E-02

NOTES

A Annual usage provided by Pinnacle operating records

B =  $12.46 \cdot ((S \cdot P \cdot M) / T) / 1000$ , where S = saturation factor (1.45, AP-42 Table 5.2-1), P = true vapor pressure of liquid (0.0090 psia, AP-42 Table 7.1-2), M = vapor molecular weight (130 lb/lb-mole, AP-42 Table 7.1-2), and T = temperature of bulk liquid loaded (530°R). Methodology obtained from AP-42, Section 5.2, Equation 1 (June 2008)

C =  $(264.2 \cdot ((-5.909) \cdot (0.0949 \cdot T) + (0.0884 \cdot T_0) + (0.485 \cdot RVP))) / (1000 \text{ mg/g} \cdot 454 \text{ g/lb} \cdot 0.26 \text{ gal/l})$ , where T = temperature difference between fuel in vehicle tank and dispensed fuel (0°F), TD = temperature of dispensed fuel (conservatively assumed 70°F), and RVP = the Reid Vapor Pressure (0.213 psia, letter to J.F. Durham from P.B. Murphy, 8/10/93). Methodology obtained from AP-42, Section 5.2, Equation 6. Plant tank dispenses fuel directly into wet wash cells, therefore, no emissions are expected.

D AP-42, Section 5.2, Table 5.2-7, Emissions from Fuel Spillage. Emission factor represents spillage of gasoline, which is more volatile than diesel. Plant tank dispenses fuel directly into wet wash cells, therefore, no emissions are expected.

E = (B + C + D) \* A

F = E / 2000

\* Speciation profile obtained from Radian Corporation report prepared for J.F. Durham, USEPA (August 10, 1993), regarding liquid and vapor HAP concentrations of various petroleum products.

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
VOC EMISSIONS FROM KEROSENE AND OTHER STORAGE TANKS (BREATHING/WORKING LOSSES)

Storage Tank	Capacity (gal)	Throughput (gal/yr) A	VOC Emissions			
			Working Losses (lb/yr) B	Breathing Losses (lb/yr) B	Total Losses (lb/yr) B	Total Losses (ton/yr) C
Kerosene Tank Throughput (SPCC-PPP-17, thermal dryer, 3500 gal)	3,500	4,650	0	0.00	0.00	0.00000
GPP-O13883-02 Frother	6,000	45,270	1.31	3.42	4.73	0.002
TOTAL						0.002

AIR TOXIC SPECIATION PROFILE (KEROSENE ONLY)\*\*

Pollutant	Percentage** (wt%)	Emissions (tons/yr)
2,2,4-Trimethylpentane	0.33	0.00E+00
Benzene	2.15	0.00E+00
Biphenyl	0.00087	0.00E+00
Cresols	0.0038	0.00E+00
Cumene	0.19	0.00E+00
Ethylbenzene	0.89	0.00E+00
Hexane	22.82	0.00E+00
Napthalene	0.080	0.00E+00
Phenol	0.014	0.00E+00
Toluene	6.00	0.00E+00
Xylene	2.91	0.00E+00

NOTES:

A: Annual usage provided by Pinnacle operating records.

B: Emission values obtained from USEPA TANKS v4.09b.

C = B / 2000

\* Frother conservatively modeled as 100% n-butanol (actually contains 10%-20%, but could also include 70%-100% as well).

\*\* Speciation profile obtained from Radian Corporation report prepared for J.F. Durham, USEPA (August 10, 1993), regarding liquid and vapor HAP concentrations of various petroleum products.



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALUCLATIONS  
VOC EMISSIONS FROM KEROSENE AND OTHER TANK LOADING, DISPENSING, AND SPILLAGE

Storage Tank	Capacity (gal)	Throughput (gal/yr) A	Annual VOC Losses			VOC Emissions (lbs/yr) D	VOC Emissions (tons/yr) E
			Tank Loading (lbs/gal) B	Vehicle Refueling (lbs/gal) C	Spillage (lbs/gal) D		
Kerosene Tank Throughput (SPCC-PPP-17, thermal dryer, 3500 gal)	3,500	4,650	0.000049	0.0016	0.0007	10.74	0.0054
GFP-O13883-02 Frother	6,000	45,270	0.00019	---	---	8.58	0.0043
TOTAL							0.0057

AIR TOXIC SPECIATION PROFILE (KEROSENE ONLY)\*\*

Pollutant	Percentage* (wt%)	Emissions (tons/yr)
2,2,4-Trimethylpentane	0.33	1.76E-05
Benzene	2.15	1.15E-04
Biphenyl	0.00087	4.67E-08
Cresols	0.0038	2.05E-07
Cumene	0.19	1.04E-05
Ethylbenzene	0.89	4.79E-05
Hexane	22.82	1.23E-03
Naphthalene	0.080	4.27E-06
Phenol	0.014	7.45E-07
Toluene	6.00	3.22E-04
Xylene	2.91	1.56E-04

NOTES

A Annual usage provided by Pinnacle operating records

B =  $12.46 * ((S * P * M) / T) / 1000$ , where S = saturation factor (1.45, AP-42 Table 5.2-1), P = true vapor pressure of liquid (0.011 psia for kerosene from AP-42 Table 7.1-2, and 0.075 psia for n-butanol from TANKS 4.02 report), M = vapor molecular weight (130 lb/lb-mole for kerosene from AP-42 Table 7.1-2 and 74.12 lb/lb-mole from TANKS 4.02 report), and T = temperature of bulk liquid loaded (530 °R). Methodology obtained from AP-42, Section 5.2, Equation 1 (June 2008).

C =  $(284.2 * ((-5.909) - (0.0949 * T) + (0.0884 * T_D) + (0.485 * RVP))) / (1000 \text{ mg/g} * 454 \text{ g/lb} * 0.26 \text{ gal/l})$ , where T = temperature difference between fuel in vehicle tank and dispensed fuel (0 °F), T\_D = temperature of dispensed fuel (conservatively assumed 70 °F), and RVP = the Reid Vapor Pressure (0.863 for kerosene, letter to J.F. Durham from P.B. Murphy, 8/10/93). Methodology obtained from AP-42, Section 5.2, Equation 6. Plant tank dispenses frother directly into wet wash cells, therefore, no emissions are expected.

D AP-42, Section 5.2, Table 5.2-7, Emissions from Fuel Spillage. Emission factor represents spillage of gasoline, which is more volatile than kerosene. Plant tank dispenses frother directly into wet wash cells, therefore, no emissions are expected.

E = (B + C + D) \* A

F = E / 2000

\* Frother conservatively modeled as 100% n-butanol (actually contains 10%-20%, but could also include 70%-100% as well).

\*\* Speciation profile obtained from Radian Corporation report prepared for J.F. Durham, USEPA (August 10, 1993), regarding liquid and vapor HAP concentrations of various petroleum products



PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
 TITLE V POTENTIAL TO EMIT CALUCLATIONS  
 CRITERIA AIR POLLUTANT EMISSIONS FROM MANETITE TANK

D-15: Magnetite Tank (100 ton capacity)

Pollutant	Emission Factor (lb/ton) A	Maximum Op Schedule (hr/yr) B	Maximum Transfer Rate (ton/hr) C	Uncontrolled Emissions (lb/yr) D	Uncontrolled Emissions (lb/hr) E	Uncontrolled Emissions (ton/yr) F	Control Efficiency (%) G	Controlled Emissions (lb/hr) H	Controlled Emissions (ton/yr) I
PM	0.61	81	25	1234	15.3	0.6	90	1.525	0.062

NOTES:

A: Obtained from AP-42, Section 11.17, Table 11.17-4, Product loading to an enclosed truck

B: Maximum operation schedule is based on 532.49 tons of magnetite purchased in 2010 multiplied by 3.8, which is the ratio of the coal production in 2010 (1,826,157 ton of coal) to the maximum production (6,912,500 tons of coal). The magnetite is transferred into the tank at a rate of 25 ton/hr.

C: Maximum transfer rate of magnetite from a truck to the silo supplied by rock dust vender.

$$D = A * B * C$$

$$E = A * C$$

$$F = D / 2000[\text{lb/ton}]$$

G: Control Efficiency based on a MERV 13 filter

$$H = E * (1 - (G / 100))$$

$$I = F * (1 - (G / 100))$$

PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT  
TITLE V POTENTIAL TO EMIT CALCULATIONS  
CONCENTRATION OF HAP IN COAL

Raw Coal HAP	Sample 1 Concentration		Sample 2 Concentration		Sample 3 Concentration		Sample 4 Concentration		Maximum Concentration	
	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)
Antimony	0	0	0	0	0	0	0.93	0.000093	0.93	0.000093
Arsenic	23.6	0.00236	59.2	0.00592	10.1	0.00101	0	0	59.2	0.00592
Beryllium	0	0	0	0	0	0	0	0	0.81	0.000081
Cadmium	0.065	0.000065	0	0	0	0	0	0	0.065	0.000065
Chlorine	622	0.0622	393	0.0393	732	0.0732	0	0	732	0.0732
Chromium	5.25	0.000525	9.35	0.000935	8.8	0.00088	0	0	9.35	0.000935
Cobalt	5.3	0.00053	6.1	0.00061	6.5	0.00065	0	0	6.1	0.00061
Fluorine	105	0.0105	200	0.02	128	0.0128	0	0	200	0.02
Lead	6.75	0.000675	15.3	0.00153	0	0	0	0	15.3	0.00153
Manganese	28.6	0.00286	98.2	0.00982	71.8	0.00718	0	0	98.2	0.00982
Mercury	0	0	0.14	0.000014	0	0	0	0	0.14	0.000014
Nickel	10.4	0.00104	19	0.0019	16.4	0.00164	0	0	19	0.0019
Selenium	2.07	0.000207	4.08	0.000408	0	0	0	0	4.08	0.000408

Clean Coal HAP	Sample 5 Concentration		Sample 6 Concentration		Sample 7 Concentration		Sample 8 Concentration		Sample 9 Concentration		Sample 10 Concentration		Maximum Concentration	
	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)	(mg/kg)	(wt%)
Antimony	0	0	0	0	0	0	0	0	0	0	0.66	0.000066	0.66	0.000066
Arsenic	11.1	0.00111	0	0	9.4	0.00094	0	0	0	0	0	0	11.10	0.00111
Beryllium	0	0	0	0	0	0	0	0	0.575	0.0000575	0	0	0.58	0.0000575
Cadmium	0.055	0.000055	0	0	0	0	0	0	0	0	0	0	0.06	0.000055
Chlorine	697	0.0697	0	0	745	0.0745	0	0	742	0.0742	0	0	745.00	0.0745
Chromium	5.7	0.00057	3.38	0.000338	4.45	0.000445	4.65	0.000465	4.15	0.000415	0	0	5.70	0.00057
Cobalt	5.95	0.000595	0	0	8.3	0.00083	0	0	6.32	0.000632	0	0	8.30	0.00083
Fluorine	44.6	0.00446	0	0	63.7	0.00637	0	0	88	0.0088	0	0	88.00	0.0088
Lead	5.3	0.00053	0	0	3.84	0.000384	0	0	0	0	0	0	5.30	0.00053
Manganese	10.4	0.00104	0	0	14.2	0.00142	0	0	8.75	0.000875	0	0	14.20	0.00142
Mercury	0	0	0	0	0	0	0	0	0	0	0	0	0.11	0.000011
Nickel	9.1	0.00091	0	0	11.4	0.00114	0	0	12.6	0.00126	0	0	12.60	0.00126
Selenium	1.58	0.000158	0	0	1.98	0.000198	0	0	0	0	0	0	1.98	0.000198

Notes

Sample 1 Indian Ridge - Raw Coal (Precision #740136 - 7/99)

Sample 2 Pinnacle - Raw Coal (Precision #740135 - 7/99)

Sample 3 Sewell - Raw Coal (REI #0005231-01A 5/4/00)

Sample 4 Raw Coal (EPCRA Section 313 Industry Guidance - Coal Mining Facilities)

Sample 5 Indian Ridge - Clean Coal (Precision #740138 - 7/99)

Sample 6 Indian Ridge - Clean Coal (REI #0004429-02A 4/13/00)

Sample 7 Pinnacle - Clean Coal (Precision #740137 - 7/99)

Sample 8 Pinnacle - Clean Coal (REI #0004429-03A 4/13/00)

Sample 9 Sewell - Clean Coal (REI #0004429-01A & 0005021-01A 4/13/00)

Sample 10 Clean Coal (Raw Coal concentrations and Coal Cleaning Factors from EPCRA Coal Mining Guidance)

Beryllium and Mercury were analyzed for raw or clean coal only. Other concentration (raw or clean) was based on available measured concentration, converted using coal cleaning factors (assumed no mercury removal for conservatism)

**PINNACLE MINING COMPANY, LLC - PINNACLE PREP PLANT**  
**TITLE V POTENTIAL TO EMIT CALCULATIONS**  
**CALCULATION DATA**

		<b>Potential Emissions</b>	
1 a	No. 50 Mine Raw Coal Output (after breakers)	8,912,500	Tons/yr
b	Raw Coal Input to Old Saw Mill	250,000	Tons/yr
c	Screen OSS-1 Raw Coal Throughput	0	Tons/yr
d	Coal From Outside Sources to ST-10 directly	550,000	Tons/yr
e	Coal From Outside Sources to ST-10 via Truck Scale	250,000	Tons/yr
f	Coal From Outside Sources directly to ST-10	300,000	Tons/yr
g	Coal From OS-1 to ST-10	250,000	Tons/yr
h	Coal From ST-2 (temp. storage for ST-10) to Rail Cars	180,000	Tons/yr
i	Coal from Outside Sources to ST-14	1,000,000	Tons/yr
j	Coal From Outside Sources to ST-14 via OS-1	0	Tons/yr
k	Other Coal From Outside Sources ST-14	1,000,000	Tons/yr
l	Total Raw Coal From Outside Sources (b+d+i+q)	1,550,000	Tons/yr
m	Coal moving flexibility from any pile to any pile	100,000	Tons/yr
n	Coal moving flexibility temporary storage at ST-2 for transfer to ST-10	180,000	Tons/yr
o	Recovered Pond Fines trucked to ST-16	500,000	Tons/yr
p	Coal trucked to/from ST-13 or ST-16	360,000	Tons/yr
q	Coal/pond fines transferred to DHRC-4	300,000	Tons/yr
r	Coal/pond fines transferred from ST-16 via feeders	150,000	Tons/yr
2 a	Thermal Dryer Operating Hours	7,083	Hrs/yr
b	Thermal Dryer Coal Burned	52,273	Tons/yr
c	Average Coal Sulfur Content	N/A	wt%
3 a	D-1 Tank Diesel Throughput (SPCC-PPP-04, off-road vehicles, 15,000 gal)	810,000	Gal/Yr
b	D-4 Tank Diesel Throughput (SPCC-PPP-08, on-road vehicles, 1000 gal)	52,000	Gal/Yr
c	D-5 Tank Diesel Throughput (SPCC-PPP-09, process, 6000 gal)	63,000	Gal/Yr
d	Kerosene Tank Throughput (SPCC-PPP-17, thermal dryer, 3500 gal)	4,650	Gal/Yr
4 a	Other Chemicals (List Below)		
	Chemical Name / Purpose		
	Nalco 7880 / WWT (replaced Nalco 7883)	85,950	Gal/Yr
	Nalco 9843 / Frother	45,270	Gal/Yr
	Nalco 8803 / Car Top Dust Binder	14,999	Gal/Yr
	Nalco 1293 / Dust Ban	6,399	Gal/Yr
	Nalco 8882 / Deicer	5,250	Gal/Yr
	Nalco 83904 / Flocculant (Previously Nalco 8873)	14,050	Gal/Yr
	Nalco 9851+ / Cation (Previously Nalco 8853)	5,560	Gal/Yr
	Nalco 8880	43,258	Gal/Yr
	Nalco 9344 / Green Collector, Replacement for Diesel Fuel	78,250	Gal/Yr
5 a	Thermal Dryer Stack Test Results		
b	PM Stack Test Emission Rate	77.0	lbs/hr
c	SO <sub>2</sub> Stack Test Emission Rate	50.3	lbs/hr
d	NO <sub>x</sub> Stack Test Emission Rate	93.9	lbs/hr
e	CO Stack Test Emission Rate	50.3	lbs/hr
f	VOC Stack Test Emission Rate	41.3	lbs/hr

## ATTACHMENT J

### EMISSION POINTS AND POLLUTION CONTROL DEVICES



## ATTACHMENT J EMISSION POINTS AND POLLUTION CONTROL DEVICES

The following table provides a list of regulated air pollutant emission sources to be operated at the subject facility:

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
Saw Mill Storage Addition							
OS1	631,000 tons	I - 1998 M- 1999 M-2000 M - 2001 M - 2002	Open Stockpile OS-1 - Receives coal via dump truck. A front-endloader is used to move coal from the Open Stockpile OS-1 to trucks for hauling to Stockpiles ST-2, ST-11, ST-13, ST-14, ST-16 or Storage Pit ST-10.	N	B  A	T65  T92	MD  N
Rotary Breakers (C11-1 & C11-2) Circuit							
ST-14	54,000 Tons	A - 2002 M-2001	Raw Coal Open Stockpile ST-14 - Receives coal by truck from Stockpile OS-1 and off site suppliers and transfers it via front-endloader to Dump Hopper DH-3 and/or front endloader to truck.	N	B  A	T93  T94 T104	MC  PE MC
DH-3	45 Tons	I - 2001	Dump Hopper DH-3 - Receives coal via truck and/or a front-endloader from Raw Coal Open Stockpile ST-14 and transfers it to Conveyor C10-3.	PE	B  A	T94  T95	PE  PE
C10-3	1,000 TPH	I - 2001	Conveyor C10-3 - Receives coal from Dump Hopper DH-3 and transfers it to Mine Car Dump MCD-1.	PE	B  A	T95  T96	PE  FE
MCD-1	40 Tons	I - 2001	Mine Car Dump MCD-1 - Receives coal from Conveyor C10-3 and transfers it to Conveyors C11 - 1 and/or C11-2 via feeders in the bottom of MCD-1.	PE	B  A	T96  T72A T72B	FE  FE FE
C11-1	1,000 TPH	I - 1970	Conveyor C11-1 - Receives coal from Mine Car Dump MCD-1, Conveyor S3A and Conveyor C11-4, and transfers it to Rotary Breaker 13-1.	PE	B  A	T72A T73 T111  T75	FE PE PE  PE



**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
C11-2	1,000 TPH	I - 1970	Conveyor C11-2 - Receives coal from Mine Car Dump MCD-1, Conveyor C11-4, and Conveyor S3A and transfers it to Rotary Breaker 13-2.	PE	B   A	T72B T74 T112  T76	FE PE PE  PE
C11-4	800 TPH	I-1979	Conveyor C11-4 - Receives coal from the Storage Pit ST-10 and transfers it to Belt Conveyor C11-1 and/or Belt Conveyor C11-2.	PE	B  A	T4-9 T73 T74	PE PE PE
Rotary Breaker 13-1 (13-1E)	1,000 TPH	I - 1970	Rotary Breaker 13-1 - Receives coal from Conveyor C11-1. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T75  T8-1 T9-1A	PE  PE PE
Rotary Breaker 13-2 (13-2E)	1,000 TPH	I - 1970	Rotary Breaker 13-2 - Receives coal from Conveyor C11-2. Transfers refuse to Belt Conveyor 8A. Transfers coal through a feeder to the 60" Raw Coal Belt Conveyor C24.	FE	B  A	T76  T8-2 T9-1B	PE  PE PE
8A	Continued Under Refuse Circuit						
C24	Continued Under Raw Coal Handling System						
Raw Coal Handling System							
S10	4000 TPH	I - 1986 M - 1998 M - 2006	Conveyor S10 - Receives coal from No. 50 Mine and transfers it to Scalping Screen SS-1. (1998 - Lengthened only... No design capacity increase) (2006 -added SS-1 bypass chute to divert coal directly to ST-11).	PE	B  A	-----  T50 T120	-----  FE N
S3A	2,500 TPH	I-1986 M-2002	Conveyor S3A - Receives coal from Scalping screen SS-1 and transfers it to Belt Conveyor C11-1 and/or C11-2.	PE	B  A	T110  T111 T112	FE  PE PE
SS-1	4000 TPH	I - 1998	Scalping Screen SS-1 - Receives coal from Conveyor S10. Oversized coal is routed to the Shawnee Rotary Breaker S6. Undersized coal goes to a two-way flop gate, which can transfer coal to Conveyor RCT-1 or Conveyor S3B.	FE	B  A	T50  T54 T51 T53 T110	FE  FE FE FE

**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
S6	1500 TPH	I-1986	Shawnee Rotary Breaker S6 - Receives coal from Scalping Screen SS-1. Refuse is transferred to Conveyor S7. Coal exiting the Rotary Breaker is transferred to Conveyor S5.	FE	B A	T54 T28-3 T27-5	FE PE PE
S7	Continued under Refuse Circuit						
RCT-1	4000 TPH	I - 1998	Conveyor RCT-1 - Receives coal from Scalping Screen SS-1 and transfers it to Conveyor S5.	FE	B A	T51 T52	FE FE
S5	4000 TPH	I - 1986 M - 1998	Conveyor S5 - Receives coal from Conveyor RCT-1 and Rotary Breaker S6, and transfers it to a Stack Tube/Stockpile ST-11. Note that Conveyor S5 was lengthened and its design capacity increased to 4,000 TPH.	PE	B A	T52 T27-5 T49	FE PE MD
ST-11	1,106,000 Tons	I - 1986 M-1998 M - 2001 M - 2006	Stack Tube/Stockpile ST-11 - Receives coal from Conveyor S5, truck, and SS-1 bypass chute and transfers via underground feeder to Conveyor S3 and/or via front endloader to truck.	N	B A	T49 T120 T103 T32 T102	MD N N FE MC
S3	2,500 TPH	I - 1986	Conveyor S3 - Receives coal from underground feeder located beneath Stack Tube/Stockpile ST-11 and transfers it to Conveyor S3B.	PE	B A	T32 T33	FE PE
S3B	4,000 TPH	I - 1986 M - 1998	Conveyor S3B - Receives coal from Conveyor S3 and Scalping Screen SS-1 two-way flop gate, and routes it to 60" Raw Coal Belt Conveyor C24. Design capacity increased to 4,000 TPH.	PE	B A	T33 T53 T34	PE FE PE
C24	4,000 TPH	I - 1970 M- 1994	Conveyor C24 - Receives coal from Conveyor S3B and Rotary Breakers 13-1 and 13-2 and transfers it to Raw Coal Storage Silo A ST-3, Conveyor C31, or Conveyor C31-A.	FE	B A	T34 T8-1 T8-2 T10-3 T10-2 T10-1	PE PE PE FE FE PE
<b>Raw Coal to Storage and to Preparation Plant</b>							
ST-3	6,000 Tons	I - 1970	6,000 Ton Raw Coal Storage Silo A ST-3 - Receives coal from Conveyor C24 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	B A	T10-3 T12-1	FE FE



**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
C31	4,000 TPH	I - 1970 M - 1994	Conveyor C31 - Receives coal from Conveyor C24 and transfers it to Raw Coal Storage Silo ST-4.	FE	B	T10-2	FE
ST-4	6,000 Tons	I - 1970	Raw Coal Storage Silo B ST-4 - Receives coal from Conveyor C31 and transfers it via one mass flow feeder and six 48" reciprocating feeders to a 48" Raw Coal Belt C37.	N	A	T10-4 T12-2	FE FE
C31-A	4,000 TPH	I - 1981	Conveyor C31-A - Receives coal from Conveyor C24 and transfers coal to Stack Tube/Raw Coal Storage Stockpile ST-2.	PE	B	T10-1	PE
ST-2	77,000 Tons	I - 1981 M - 2001	Raw Coal Storage Stockpile ST-2 - Receives coal from Conveyor C31-A and truck dump and transfers it via front-endloader to Feeder C36, Storage Pit ST-10, trucks, and/or railcar.	N	A	T11 T101 T100 T77 T113	MC MD MD MD, PE MD
C36	500 TPH	I - 1981	Feeder C36 - Receives coal from Raw Coal Storage Stockpile ST-2 and transfers it to the 48" Raw Coal Belt Conveyor C37.	PE	B	T77	PE
C37	1,500 TPH	I - 1970	48" Raw Coal Belt Conveyor C37 - Receives coal from the 48" Reciprocating Feeders from Raw Coal Storage Silos A and B (ST-3 and ST-4) and Feeder C36, and transfers it to Conveyor C45.	FE	A	T12-3	FE
C45	1,500 TPH	I - 1970	Conveyor C45 - Receives coal from Conveyor C37 and transfers it into the preparation plant.	PE	B	T12-1 T12-2 T12-3 T13	FE FE FE FE
<b>Refuse Circuit</b>					A	-----	-----
8A	400 TPH	I - 1992	Conveyor 8A - Receives refuse from Rotary Breakers 13-1 and 13-2. Refuse is transferred to Conveyor C8.	N	B	T9-1A T9-1B	PE PE
C8	Continued below under C8						
S7	800 TPH	I - 1986	Conveyor S7 - Receives refuse from the Rotary Breaker S6 and transfers it to the 80 ton Rock Bin.	PE	A	T46-2 T28-3 T29	FE PE PE

**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
Rock Bin	80 Ton	I - 1970	Rock Bin - Receives refuse from Conveyor S7 and transfers it to a 72" Reciprocating Feeder.	FE	B	T29	PE
					A	----	----
Rock Crusher #6	280 TPH	I - 1970	Rock Crusher #6 - Receives refuse from Rock Bin and transfers it to 36" Rock Belt Conveyor C8.	FE	B	T34-2a	FE
					A	T35	FE
C8	400 TPH	I - 1970	36" Rock Belt Conveyor C8 - Receives refuse from Rock Bin #6, Rock Crusher #6, and Conveyor 8A. Transfers refuse to the 400 ton Refuse Bin ST-7.	PE	B	T34-2b T35 T46-2	FE FE FE
					A	T36	FE
C125	463 TPH	I - 1970	36" Plant Refuse Belt Conveyor C125 - Transfers refuse from the Preparation Plant's Washing Circuit to the 400 ton Refuse Bin ST-7.	PE	B	----	----
					A	T37	FE
ST-7	400 Ton	I - 1970	400 Ton Refuse Bin ST-7 - Receives coal refuse from 36" Rock Belt Conveyor C8 and 36" Plant Refuse Belt Conveyor C125 and transfers it to feeder 127 and then to Refuse Belt Conveyor C128-1 or the Emergency Refuse Stockpile.	FE	B	T36 T37	FE FE
					A	----	----
C128-1	400 TPH	I - 1970	Conveyor - Receives refuse from Refuse Bin ST-7 and transfers it Point "A" Storage Bin ST-8.	PE	B	T38	FE
					A	T39	FE
ST-8	85 Tons	I - 1970	Point "A" Storage Bin ST-8 - Receives refuse from Conveyor C128-1 and transfers it to Belt Conveyor C128-2.	FE	B	T39	FE
					A	----	----
C128-2	400 TPH	I - 1970	Conveyor C128-2 - Receives refuse from Storage Bin ST-8 and transfers it to Conveyor C128-3.	PE	B	T40	PE
					A	T41	PE
C128-3	400 TPH	I - 1983	Conveyor C128-3 - Receives refuse from Conveyor C128-2 and transfers it to Conveyor C128-4.	N	B	T41	PE
					A	T42	PE
C128-4	400 TPH	I - 1983	Conveyor C128-4 - Receives refuse from Conveyor C128-3 and transfers it to Conveyor C128-5.	N	B	T42	PE
					A	T43	PE
C128-5	400 TPH	I - 2001	Conveyor C128-5 - Receives refuse from Conveyor C128-4 and transfers it to conveyor C128-6.	N	B	T43	PE
					A	T44	PE



**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
C128-6 (C128-5E)	400 TPH	I - 2006	Conveyor C128-6 - Receives refuse from Conveyor C128-5 and transfers it to Stacking Belt Conveyor.	PE	B A	T44 T121	PE PE
Stacking Belt Conveyor	400 TPH	I - 1970	Stacking Belt Conveyor - Receives refuse from Conveyor C128-5 and transfers it to the Refuse Stockpile ST-12.	PE	B A	T121 T45	PE MC
ST-12	26,000 Tons	I - 1970	Refuse Stockpile ST-12 - Receives refuse from Stacking Belt Conveyor and dozers move into permanent storage. .	N	B A	T45 -----	MC -----
Rotary Breakers ( 13-1 & 13-2 ) Bypass							
Raw Coal Auger Sampler	N/A	I - 1998	Raw Coal Auger Sampler - Samples coal from dump trucks at the truck scales. Emissions are expected to be minimal.	N	B A	----- -----	----- -----
ST-10	50 Tons	I - 1979 M - 2001	Raw Coal Storage Pit ST-10 - Receives coal from dump trucks and front-endloader and transfers it to Conveyor C11-4.	PE	B A	T4-8 T105 T4-9	MC MC PE
C11-4	Continued Under Rotary Breakers ( 13-1 & 13-2 ) Circuit						
RC-1	Continued under Clean Coal Circuit						
Clean Coal Circuit							
TD1	800 TPH	I - 1970 M- 1996	McNally Fluidized bed Thermal Dryer with two cyclones and two venturi scrubbers.	CY, SC, ME	B A	----- 001-2A,B	----- CY, SC, ME
C100	800 TPH	I - 1970	42" Dryer Feed Belt Conveyor C100 - Transfers wet coal from Preparation to Thermal Dryer, which dries it and transfers to Horizontal Axis Mixer No. 120.	PE	B A	----- T15	----- PE
C118	800 TPH	I - 1970 M-1995	54" Coarse Clean Coal Belt Conveyor - Receives coarse clean coal from inside Preparation Plant and transfers it to Horizontal Axis Mixer No. 120.	PE	B A	----- T16	----- FE, SC
Horizontal Axis Mixer No. 120	320 TPH	I - 1970	Horizontal Axis Mixer No. 120. Receives coarse clean coal from Conveyor C118 and clean coal from Thermal Dryer, and transfers coal to 72" Clean Coal Transfer Belt Conveyor C119.	FE	B A	T16 T17	FE, SC FE, SC
C119	1,000 TPH	I - 1970	72" Clean Coal Transfer Belt Conveyor C119 - Receives coal from the Horizontal Axis Mixer No. 120 and transfers coal to 48" Clean Coal Belt Conveyor C132.	FE	B A	T17 T18	FE, SC FE, SC



**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
C132	1,000 TPH	I - 1970	48" Clean Coal Belt Conveyor C132 - Receives coal from the 72" Clean Coal Transfer Belt Conveyor C119 and transfers it to the 10,000 Ton Clean Storage Silo ST-5 and/or Conveyor SC-1.	FE	B A	T18 T19 T19A	FE, SC FE FE
ST-5	10,000 Ton	I - 1970	Storage 4 - 10,000 Ton Clean Coal Storage Silo ST-5. Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfers it through one mass flow feeder and six 48" reciprocating feeders to a 72" Collecting Belt Conveyor C139.	FE	B A	T19 T20	FE FE, SC
C139	5,000 TPH	I - 1970 M - 1998	72" Collecting Belt Conveyor C139 - Receives coal from Storage 4 (ST-5) through one mass flow feeder and six 48" reciprocating feeders. Transfers coal to the 72" Belt Conveyor to Sampling Tower C141. Design capacity increased to 5,000 TPH.	FE	B A	T20 T21	FE, SC FE, SC
C141	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor C141 - Receives coal from 72" Collecting Belt Conveyor C139 and Conveyor RC-1, and transfers it to the 72" Belt Conveyor C152. Design capacity increased to 5,000 TPH. A small portion of coal from Conveyor C141 is transferred to and from the Clean Coal Sampler System.	FE	B A	T21 T23 T24	FE, SC FE, SC FE
Clean Coal Sampler System (F01 & F02)	N/A	I - 1970 M - 1998	Clean Coal Sampler System - Receives coal from 72" Belt Conveyor C141 via Primary Sample Belt Conveyor and transfers it to the Primary Sample Crusher and the Nuclear Analyzer and subsequently back to conveyor C141.	FE	B A	----- -----	----- -----
C152	5,000 TPH	I - 1970 M - 1998	72" Belt Conveyor to Loading Bin C152 - Receives coal from 72" Belt Conveyor C141 and transfers it to the 200 Ton Loading Bin ST-6. Design capacity increased to 5,000 TPH.	FE	B A	T24 T25	FE FE
ST-6	200 Ton	I - 1970 M - 2001 M - 2004	200 Ton Loading Bin ST-6 - Receives coal from the 72" Belt Conveyor C152 and transfers it to railroad cars.	FE	B A	T25 T26	FE FE, DSS
SC-1	1,000 TPH	I - 1991	Belt Conveyor SC-1 - Receives coal from the 48" Clean Coal Belt Conveyor C132 and transfers it to the Stack Tube/Clean Coal Storage Stockpile ST-13.	PE	B A	T19A T19B	FE MC
ST-13	514,000 Tons	I - 1991 M - 1998 M - 2002	Stack Tube/Clean Coal Storage Stockpile ST-13 - Receives clean coal from Conveyor SC-1 and transfers it using six vibrating feeders to Belt Conveyor RC-1 and/or via front end loader to truck. Up to 360,000 TPY combined may be trucked to and from ST-13.	N	B A	T19B T114 T22 T119	MC N FE N

**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
RC-1	4,000 TPH	I - 1991 M - 1998	Belt Conveyor RC-1 - Receives coal from six vibrating feeders located underneath the Clean Coal Storage Stockpile ST-13 and also from Belt Conveyor RC-5, and transfers it to the 72" Belt Conveyor C141.	PE	B  A	T22 T81  T23	FE FE  FE, SC
Trucked Coal and Coal Fines Circuit							
ST-16 (ST-16E)	120,000 Ton	I - 2002  A - 2008	Coal & Pond Fines Open Stockpile ST-16 - Receives coal and pond fines by truck and transfers it via front-end loader to Dump Hopper DHRC-4; via underground feeders to conveyor C120; and/or via front-end loader to truck.	N	B  A	T122 T134 T124 T135 T126	N N PE MD FE
DHRC-4 (DHRC-4E)		I - 2002 A - 2008	Dump Hopper DHRC-4 - Receives coal and/or pond fines by front-end loader and transfers it to Conveyor C120.	PE	B  A	T124  T125	MD  PE
C120 (C120E)	1,150 TPH	I - 2002 A - 2008	Conveyor C120 - Receives coal and/or pond fines from Stockpile ST-16's underground feeders and/or Dump Hopper DHRC-4 and transfers it to Conveyor C121 or Conveyor RC-5.	PE	B  A	T125 T126 T127A T127B	PE FE PE PE
C121 (C121E)	5 TPH	I - 2002 A - 2008	Conveyor C121 - Receives coal and/or pond fines from Conveyor C120 and transfers it to Conveyor C122 and Sample Collector.	PE	B  A	T127A  T128	PE  FE
C122 (C122E)	5 TPH	I - 2002 A - 2008	Conveyor C122 - Receives coal and/or pond fines from Conveyor C121 and transfers it to Conveyor RC-5.	PE	B A	T129 T130	FE PE
RC-5 (RC-5E)	4000 TPH	I - 1998 M - 1999 M - 2001	Belt Conveyor RC-5 - Receives coal and/or coal fines from Conveyor C120 and C122 and transfers to Conveyor RC-1 (see Clean Coal Circuit).	N	B  A	T127B T130 T81	PE PE FE

**ATTACHMENT J (Continued)**  
**EMISSION POINTS AND POLLUTION CONTROL DEVICES**

Equipment ID Number	Design Capacity	Year Installed / Modified (2)	Description	Method of Control (1)	Associated Transfer Points or Equipment		
					Location: B - Before A - After	ID. No.	Method of Control (1)
Roadways							
PRP	N/A	I - 1970 M- 2001	Paved Roadways and parking lots.	RWMW	N/A	N/A	N/A
URP	N/A	I - 1970 M- 2001	Unpaved Roadways and parking lots	RWMW	N/A	N/A	N/A

- (1) Method of Control abbreviations: FE - Full Enclosure, PE - Partial Enclosure, WS - Water Sprays, MD - Minimization of Material Drop Height, N - None, MC - Moisture Control, DSS - Dust Suppressant Spray  
CY - Cyclones, SC - Scrubbers, ME - Mist Eliminator, RWMW - Water Truck with Manufactured Pressurized Sprays
- (2) I - Year Installed, M - Year Modified, A - Year Added, N - Not Installed Yet

ATTACHMENT K

ATTACHMENTS A THROUGH C OF PERMIT R13-2183K



Attachment A - Example Data Form

**MONTHLY PROCESSING RATE REPORT <sup>(1)</sup>**

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant

Permit No. R13-2183K

Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Raw Coal		Clean Coal			Coal Fines
	No. 50 Mine  (Ton/Day)	Wet Wash Preparation Plant  (Ton/Day)	Thermal Dryer Circuit  (Ton/Day)	Loaded to Railroad Car  (Ton/Day)	Loaded from ST-13 to Truck  (Ton/Day)	Coal and/or Coal Fines to Conveyor RC-5  (Ton/Day)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
Total -ton/month						
Twelve Month Rolling Total <sup>(2)</sup>						

Note: (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of at least five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.

(2) The Twelve Month Rolling Total shall mean the sum of the amount of coal received, processed, or shipped at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted operating rates shall not exceed the values listed in Specific Requirements A.6.



## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true and correct to the best of my knowledge and that all reasonable efforts have been made to provide the most comprehensive information possible.

Name (Type or Print): \_\_\_\_\_

Signature<sup>1</sup>: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Fax No.: \_\_\_\_\_

\_\_\_\_\_  
<sup>1</sup>This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or (ii) the delegation of authority to such representative is approved in advance by the Secretary;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Secretary.

Attachment B - Example Data Form

**MONTHLY DELIVERY RATE REPORT FROM OUTSIDE SUPPLIERS <sup>(1)</sup>**

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant

Permit No. R13-2183K

Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Delivered To Stockpile:	Amount Delivered (tons)	Twelve Month Rolling Total <sup>(2)</sup>
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

Note: (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of at least five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.

(2) The Twelve Month Rolling Total shall mean the sum of the amount of coal received, processed, or shipped at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted delivery rates shall not exceed the values listed in Specific Requirements A.7.



## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true and correct to the best of my knowledge and that all reasonable efforts have been made to provide the most comprehensive information possible.

Name (Type or Print): \_\_\_\_\_

Signature<sup>1</sup>: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Fax No.: \_\_\_\_\_

\_\_\_\_\_  
<sup>1</sup>This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or (ii) the delegation of authority to such representative is approved in advance by the Secretary;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Secretary.

Attachment C - Example Data Form

**MONTHLY TRANSFER RATE REPORT <sup>(1)</sup>**

Pinnacle Mining Company, LLC

Pinnacle Preparation Plant

Permit No. R13-2183K

Plant ID No. 109-00006

Month, Year: \_\_\_\_\_ / \_\_\_\_\_

Day of Month	Transferred From Stockpile:	Transferred To Stockpile:	Amount Transferred (tons)	Twelve Month Rolling Total <sup>(2)</sup>
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				

Note: (1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for a period of at least five (5) years and shall be made available to the Director or his or her duly authorized representative upon request.

(2) The Twelve Month Rolling Total shall mean the sum of the amount of coal transferred at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted transfer rates shall not exceed the values listed in Specific Requirements Section A.8.



## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true and correct to the best of my knowledge and that all reasonable efforts have been made to provide the most comprehensive information possible.

Name (Type or Print): \_\_\_\_\_

Signature<sup>1</sup>: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Fax No.: \_\_\_\_\_

\_\_\_\_\_  
<sup>1</sup>This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or (ii) the delegation of authority to such representative is approved in advance by the Secretary;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Secretary.



Test Report Summary    Facility Name   PINNACLE MINING CO, LLC    Facility ID#   109-00006

Test Date    Start OCTOBER 15, 2020    End OCTOBER 15, 2020


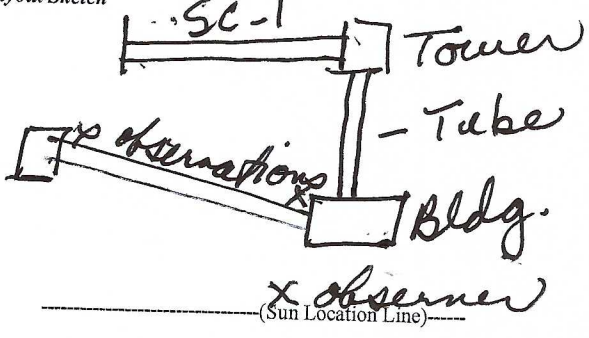
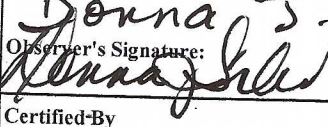
Emission Unit ID #	Permit/ Rule	Citation #	Term or Condition specified in permit/rule	Performance Test Result	Did test show compliance? Y/N
SC-1	R13-2183K	4.2	STANDARDS OF PERFORMANCE PER 40CFR60 SUPART Y – TESTING REQUIREMENTS	Average Opacity Reading of 0% for any one six minute period	Yes
Loadout Transfer Belt	R13-2183K	4.2	STANDARDS OF PERFORMANCE PER 40CFR60 SUPART Y – TESTING REQUIREMENTS	Average Opacity Reading of 0% for any one six minute period	Yes
C152	R13-2183K	4.2	STANDARDS OF PERFORMANCE PER 40CFR60 SUPART Y – TESTING REQUIREMENTS	Average Opacity Reading of 0% for any one six minute period	Yes

Rail Loadout	R13-2183K	4.2	STANDARDS OF PERFORMANCE PER 40CFR60 SUPART Y – TESTING REQUIREMENTS	Average Opacity Reading of 0% for any one six minute period	Yes
			ALL OTHER EQUIPMENT ASSOCIATED WITH THIS FACILITY HAS BEEN IDLE FOR APPROXIMATELY 3-4 YEATS		

Note: If a term or condition is the same in multiple permits or in a permit and rule, the condition needs to be cited once. A Title V permit term or condition should be cited when the requirement is stated in a Title V permit, and/or Construction/PSD permit and/or Rule. Construction/PSD permit term or condition should be cited when the requirement is stated in a Construction/PSD permit and/or a Rule. The Rule term or condition should be cited if it has not been incorporated into any permit.

312 Justice Avenue  
Logan, WV 25601

Tele:(304)752-8320

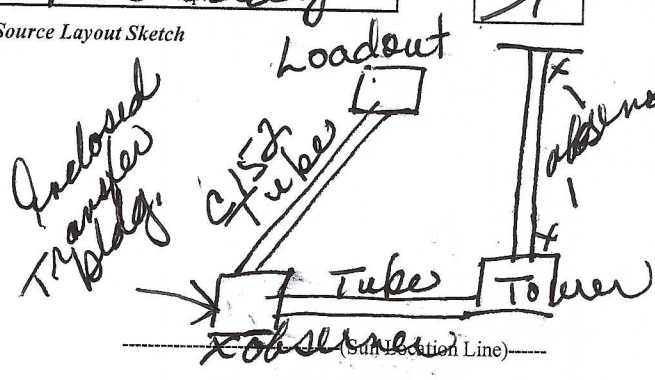
Visible Emission Observation Form											
Method Used: <b>Method 9</b>											
FACILITY NAME: <b>PINEVILLE #50 PINNACLE</b>				Observation Date: <b>10-15-20</b>				Start Time: <b>5:56</b>		Stop Time: <b>6:26</b>	
Address: <b>302 SOUTH JEFFERSON ST</b>				ID NO <b>109-00006</b>				Sec/M: 0 15 30 45		Sec/M: 0 15 30 45	
City: <b>ROANOKE</b>		State: <b>VA</b>		Zip: <b>24011</b>		1		0 0 0 0		31	
Phone:		Source ID Number: <b>C152</b>				2		0 0 0 0		32	
Process Equipment: <b>headout belt</b>		Operating Mode: <b>60%</b>				3		0 0 0 0		33	
Operating Mode: <b>fully exc. - take full</b>						4		0 0 0 0		34	
Desc. Em. Pt: <b>belt &amp; transfer</b>						5		0 0 0 0		35	
Height Above: <b>15' to 60'</b>		Height Relative to Observer: <b>same</b>				6		0 0 0 0		36	
Distance from Observer: <b>60' to 180'</b>		Direction to Observer: <b>South</b>				7		0 0 0 0		37	
Describe Emissions: <b>None</b>		Emission Color: <b>Na</b>				8		0 0 0 0		38	
Start: <b>None</b>		Start: <b>Na</b>				9		0 0 0 0		39	
Water Droplet Present: <b>Yes</b>		Attached? <b>Detached?</b>				10		0 0 0 0		40	
Plume Type(circle) Fugitive Continuous Intermittent <b>None</b>						11		0 0 0 0		41	
Pl. in Plume Where Opacity Determined: <b>53</b>		Wet Bulb Temp: <b>53</b>		RH% <b>53</b>		12		0 0 0 0		42	
Start: <b>72</b>		Stop: <b>72</b>				13		0 0 0 0		43	
Ambient Temperature: <b>72</b>		Wind Speed & Direction: <b>Calm</b>				14		0 0 0 0		44	
Describe Background: <b>Trees</b>		Background Color: <b>Green</b>				15		0 0 0 0		45	
Start: <b>Cloudy</b>		Start: <b>Green</b>				16		0 0 0 0		46	
Sky Conditions: <b>Cloudy</b>		Draw North Arrow: 				17		0 0 0 0		47	
Source Layout Sketch: 						18		0 0 0 0		48	
Observer's Name(Print): <b>Donna S. Toler</b>						19		0 0 0 0		49	
Observer's Signature: 		Date: <b>10-15-20</b>				20		0 0 0 0		50	
Certified-By: <b>Carl Koontz Associates</b>		Date: <b>9/16/2020</b>				21		0 0 0 0		51	
Nashville, TN						22		0 0 0 0		52	
Comments:						23		0 0 0 0		53	
						24		0 0 0 0		54	
						25		0 0 0 0		55	
						26		0 0 0 0		56	
						27		0 0 0 0		57	
						28		0 0 0 0		58	
						29		0 0 0 0		59	
						30		0 0 0 0		60	



Casey,  
Foreman

312 Justice Avenue  
Logan, WV 25601


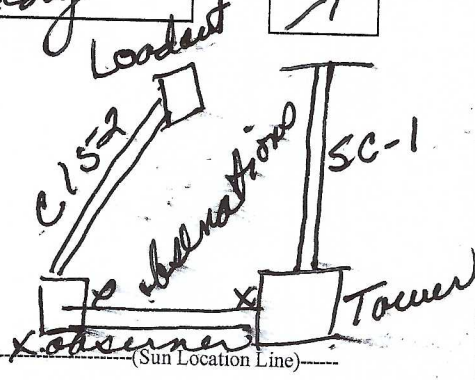
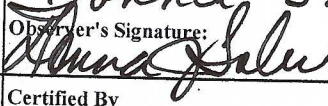
Tele:(304)752-8320

Visible Emission Observation Form															
Method Used: <b>Method 9</b>															
FACILITY NAME: <b>PINNACLE MINING CO LLC</b>						Observation Date		Start Time		Stop Time					
<b>PINEVILLE #50 PINNACLE</b>						<b>10-15-20</b>		<b>5:10</b>		<b>5:40</b>					
Address: <b>302 SOUTH JEFFERSON ST</b>						Sec/M	0	15	30	45	Sec/M	0	15	30	45
<b>ID NO 109-00006</b>						1	0	0	0	0	31				
City: <b>ROANOKE</b> State: <b>VA</b> Zip: <b>24011</b>						2	0	0	0	0	32				
Phone: _____ Source ID Number <b>5C-1</b>						3	0	0	0	0	33				
Process Equipment - <b>SP Reclaim Belt</b> Operating Mode <b>60%</b>						4	0	0	0	0	34				
						5	0	0	0	0	35				
Part. Enclosed <b>full</b> Operating Mode						6	0	0	0	0	36				
						7	0	0	0	0	37				
Desc. Em. Pt: <b>Rest &amp; transfer</b>						8	0	0	0	0	38				
Height Above C: _____ Height Relative to Observer						9	0	0	0	0	39				
Start <b>6' ↑ 30'</b> Stop: _____ Start <b>Same</b> Stop: _____						10	0	0	0	0	40				
Distance from Observer _____ Direction to Observer						11	0	0	0	0	41				
Start <b>100</b> Stop: <b>✓</b> Start <b>South</b> Stop: _____						12	0	0	0	0	42				
Describe Emissions _____ Emission Color _____						13	0	0	0	0	43				
Start <b>None</b> Stop: <b>✓</b> Start <b>NA</b> Stop: _____						14	0	0	0	0	44				
Water/Drift Present: Yes/No _____ Attached/Detached: _____						15	0	0	0	0	45				
Plume Type(circle) Fugitive Continuous Intermittent <b>(None)</b>						16	0	0	0	0	46				
Pl. in Plume Where Opacity Determined _____ Wet Bulb Temp. _____ RH% _____						17	0	0	0	0	47				
Start _____ Stop: _____ <b>51</b>						18	0	0	0	0	48				
Ambient Temperature _____ Wind Speed & Direction _____						19	0	0	0	0	49				
Start <b>73</b> Stop: <b>73</b> Start <b>Calm</b> Stop: _____						20	0	0	0	0	50				
Describe Background _____ Background Color _____						21	0	0	0	0	51				
Start <b>Tree-Plant</b> Stop: _____ Start <b>Green/Gray/Rest</b> Stop: _____						22	0	0	0	0	52				
Sky Conditions _____ Draw North Arrow _____						23	0	0	0	0	53				
Start <b>P. Cloudy</b> Stop: _____ <b>7</b>						24	0	0	0	0	54				
Source Layout Sketch						25	0	0	0	0	55				
						26	0	0	0	0	56				
						27	0	0	0	0	57				
						28	0	0	0	0	58				
						29	0	0	0	0	59				
						30	0	0	0	0	60				
Observer's Name(Print): <b>Donna J. Toler</b>						Observer's Signature: <b>Donna J. Toler</b> Date: <b>10-15-20</b>									
Comments: <b>Thermal dryer, plant, all other equipment idle - no data on restart</b>						Certified By: <b>Carl Koontz Associates</b> Date: <b>9/16/2020</b> Nashville, TN									



312 Justice Avenue  
Logan, WV 25601


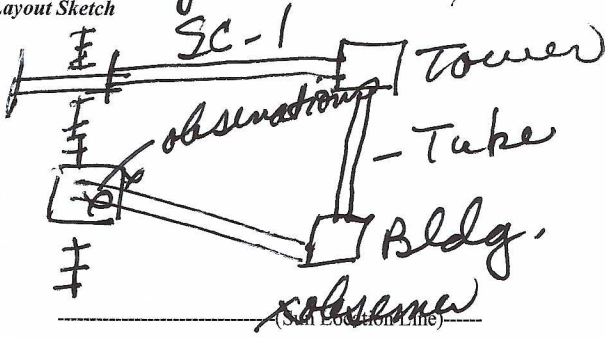

Tele:(304)752-8320

Visible Emission Observation Form															
Method Used: <b>Method 9</b>															
FACILITY NAME: <b>PINNACLE MINING CO LLC</b>		Observation Date <b>10-15-20</b>				Start Time <b>5:10</b>				Stop Time <b>5:40</b>					
Address: <b>302 SOUTH JEFFERSON ST</b>		ID NO <b>109-00006</b>				Sec/Mi	0	15	30	45	Sec/Mi	0	15	30	45
City: <b>ROANOKE</b>	State: <b>VA</b>	Zip: <b>24011</b>													
Phone: _____		Source ID Number: _____													
Process Equipment - <b>Loaded Transfer Belt</b>		Operating Mode <b>60%</b>													
Fullcycle - <b>Take</b>		Operating Mode <b>fall</b>													
Desc. Em. Pt: <b>Best Transfer</b>															
Height Above C: <b>30'</b>		Height Relative to Observer <b>Same</b>													
Distance from Observer <b>100'</b>		Direction to Observer <b>South</b>													
Describe Emissions <b>None</b>		Emission Color <b>Nil</b>													
Water Droplet Present: <b>Yes</b>		Attached? <b>Detached?</b>													
Plume Type(circle) Fugitive Continuous Intermittent <b>None</b>															
Pl. in Plume Where Opacity Determined		Wet Bulb Temp.		RH% <b>51</b>											
Ambient Temperature <b>73</b>		Wind Speed & Direction <b>Calm</b>													
Describe Background <b>Trees</b>		Background Color <b>Green</b>													
Sky Conditions <b>P. Cloudy</b>		Draw North Arrow 													
Source Layout Sketch 															
Observer's Name(Print): <b>Donna J. Toler</b>															
Observer's Signature: 		Date: <b>10-15-20</b>													
Certified By <b>Carl Koontz Associates</b>		Date <b>9/16/2020</b>													
Nashville, TN															
Comments															



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Visible Emission Observation Form														
Method Used: <b>Method 9</b>														
FACILITY NAME: <b>PINNACLE MINING CO LLC</b>					Observation Date		Start Time		Stop Time					
<b>PINEVILLE #50 PINNACLE</b>					<b>10-15-20</b>		<b>5:56</b>		<b>6:26</b>					
Address: <b>302 SOUTH JEFFERSON ST</b>					Sec/Mi	0	15	30	45	Sec/Mi	0	15	30	45
<b>ID NO 109-00006</b>					1	0	0	0	0	31				
City: <b>ROANOKE</b> State: <b>VA</b> Zip: <b>24011</b>					2	0	0	0	0	32				
Phone: _____ Source ID Number _____					3	0	0	0	0	33				
Process Equipment - <b>Rail headout</b> Operating Mode <b>60%</b>					4	0	0	0	0	34				
					5	0	0	0	0	35				
Hydraulic chute . full Operating Mode					6	0	0	0	0	36				
Desc Em. Pt: <b>loadout to railcar</b>					7	0	0	0	0	37				
					8	0	0	0	0	38				
Height Above G: _____ Height Relative to Observer					9	0	0	0	0	39				
Start <b>16'</b> Stop: <input checked="" type="checkbox"/>					10	0	0	0	0	40				
Distance from Observer _____ Direction to Observer					11	0	0	0	0	41				
Start <b>100'</b> Stop: <input checked="" type="checkbox"/>					12	0	0	0	0	42				
Describe Emissions _____ Emission Color <b>None</b>					13	0	0	0	0	43				
Start <b>None</b> Stop: <input checked="" type="checkbox"/>					14	0	0	0	0	44				
Water Droplet Present: Yes No Attached? Detached?					15	0	0	0	0	45				
Plume Type(circle) Fugitive Continuous Intermittent <b>None</b>					16	0	0	0	0	46				
Pt. In Plume Where Opacity Determined _____ Wet Bulb Temp. _____ RH%					17	0	0	0	0	47				
Start _____ Stop _____ <b>53</b>					18	0	0	0	0	48				
Ambient Temperature _____ Wind Speed & Direction					19	0	0	0	0	49				
Start <b>72</b> Stop <b>72</b> <b>Calm</b>					20	0	0	0	0	50				
Describe Background _____ Background Color					21	0	0	0	0	51				
Start <b>Trees</b> Stop: <input checked="" type="checkbox"/> <b>Green</b>					22	0	0	0	0	52				
Sky Conditions _____ Draw North Arrow					23	0	0	0	0	53				
Start <b>P. Cloudy</b> 					24	0	0	0	0	54				
Source Layout Sketch					25	0	0	0	0	55				
					26	0	0	0	0	56				
					27	0	0	0	0	57				
					28	0	0	0	0	58				
					29	0	0	0	0	59				
					30	0	0	0	0	60				
Observer's Name(Print): <b>Donna S. Toler</b>					Observer's Signature:  Date: <b>10-15-20</b>									
Comments					Certified By <b>Carl Koontz Associates</b> Date <b>9/16/2020</b>									
					Nashville, TN									

**KOONTZ & ASSOCIATES**

of Nashville, Tennessee

This is to acknowledge that

DONNA J. TOLER

successfully participated in Visible Emissions  
training on SEP 16 2020  
and is qualified to evaluate Visible Emissions  
for a period of six (6) months from the date of  
certification.

B.J.S/A  
Instructor

**KOONTZ & ASSOCIATES**

of Nashville, Tennessee

This is to acknowledge that

KRISTA OXLEY

successfully participated in Visible Emissions  
training on SEP 16 2020  
and is qualified to evaluate Visible Emissions  
for a period of six (6) months from the date of  
certification.

B.J.S/A  
Instructor